

NOTICE OF PUBLIC HEARING

Department of Energy's FFY 2016 State Plan and Application for the Low Income Weatherization Assistance Program Proposed by the Nevada Housing Division

The Nevada Housing Division will hold a public hearing at 1:30 p.m. on Wednesday, April 13, 2016 at 1535 Old Hot Springs Road, Suite 50, Carson City, Nevada 89706 with video conferencing at 7220 Bermuda Road, Suite B Las Vegas, NV 89119 and teleconference service by calling toll free – 888-636-3807 access code 3042696#

The purpose of the hearing is to receive comments from all interested parties regarding the adoption of the 2016 State Plan pertaining to the Department of Energy's (DOE) Low Income Weatherization Assistance Program for the period of July 1, 2016 to June 30, 2017.

Persons wishing to comment upon the proposed action of the Nevada Housing Division may appear at the scheduled public hearing or submit their comments in written form to the Nevada Housing Division, Attention: Sue Martin, Weatherization Manager, 1535 Old Hot Springs Road, Suite 50, Carson City, Nevada 89706. Written submissions must be received by the Housing Division on or before 5:00 p.m. April 13, 2016.

If no person who is directly affected by the proposed action appears to request time to make an oral presentation, the Housing Division may proceed immediately to act upon any written submissions.

A copy of this notice and the proposed plan to be adopted will be on file at the locations noticed below.

Copies of this notice and the proposed plan will also be mailed to members of the public upon request. A reasonable fee may be charged for copies if it is deemed necessary.

This notice of hearing has been posted at the public offices below:

Nevada Housing Division, 1535 Old Hot Springs Road, Suite 50, Carson City, Nevada 89706.

Nevada Housing Division, 7220 Bermuda Road, Suite B, Las Vegas, Nevada 89119.

Nevada State Library, 100 Stewart Street, Carson City, NV 89701.

State of Nevada Department of Business and Industry, 1830 College Parkway, Suite 100, Carson City, NV 89706

State of Nevada Department of Business and Industry, 555 E Washington Ave, Suite 4900, Las Vegas, NV 89101

This notice is also being posted on the Nevada Housing Division's website at <http://housing.nv.gov/> and Nevada's Public Notice Website at <http://notice.nv.gov>

******IMPORTANT NOTICE******

We are pleased to make reasonable accommodations for members of the public who are disabled and wish to attend the meeting. If special arrangements for the meeting are necessary, please notify the Nevada Housing Division, Sue Martin, by calling (775) 687-2037, or Denise Cox, 504 Coordinator, 775-687-2044, as soon as possible. The TTY phone number is 800-326-6868. Reasonable efforts will be made to assist and accommodate physically handicapped persons desiring to attend the hearings.

To receive the supporting documentation for this meeting please contact Sue Martin at 775-687-2037 or e-mail her at suemartin@housing.nv.gov

STATE OF NEVADA
HOUSING DIVISION

DOE APPLICATION
AND
STATE PLAN
FOR
FEDERAL ASSISTANCE

APPLICATION FOR FEDERAL ASSISTANCE
STANDARD FORM 424

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision		If Revision, select appropriate letter(s) Other (specify):	
3. Date Received 07/01/2013			4. Applicant Identifier: DE-R021683		
5a. Fed Entity Identifier:			5b. Federal Award Identifier: DE-EE0006168		
State Use Only:					
6. Date Received by State:			7. State Application Identifier:		
8. APPLICANT INFORMATION:					
a. Legal Name: State of Nevada					
b. Employer/Taxpayer Identification Number (EIN/TIN): 886000022			c. Organizational DUNS: 179258715		
d. Address:					
Street 1: 1535 Old Hot Springs Rd.					
Street 2: Suite 50					
City: Carson City					
County: CARSON CITY					
State: NV					
Province:					
Country: U.S.A.					
Zip / Postal Code: 897060666					
e. Organizational Unit:					
Department Name: Business and Industry			Division Name: Nevada Housing Division		
f. Name and contact information of person to be contacted on matters involving this application:					
Prefix: Ms		First Name: Suzanne			
Middle Name: M					
Last Name: Martin					
Suffix:					
Title: Grants & Projects Analyst					
Organizational Affiliation:					
Telephone Number: 7756872037			Fax Number: 7756876946		
Email: suemartin@housing.nv.gov					

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

9. Type of Applicant:

A State Government

10. Name of Federal Agency:

U. S. Department of Energy

11. Catalog of Federal Domestic Assistance Number:

81.042

CFDA Title:

Weatherization Assistance Program

12. Funding Opportunity Number:

DE-WAP-0002016

Title:

2016 Weatherization Assistance Funding Opportunity

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Statewide

16. Descriptive Title of Applicant's Project:

Nevada's Low Income Weatherization Assistance Program - Formula Grant

BUDGET INFORMATION
STANDARD FORM 424A

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0006168		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Nevada 1535 Old Hot Springs Rd. Carson City, NV 897060666		4. Program/Project Start Date 07/01/2016	5. Completion Date 06/30/2017

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Federal	81.042	\$ 3,613.00		\$ 871,308.00		\$ 874,921.00
2.						
3.						
4.						
5. TOTAL		\$ 3,613.00	\$ 0.00	\$ 871,308.00	\$ 0.00	\$ 874,921.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTR ATION	(2) SUBGRANTE E ADMINISTR	(3) GRANTEE T&TA	(4) SUBGRANT EE T&TA	
a. Personnel	\$ 13,833.72	\$ 0.00	\$ 6,447.72	\$ 0.00	\$ 20,281.44
b. Benefits	\$ 5,910.60	\$ 0.00	\$ 3,215.88	\$ 0.00	\$ 9,126.48
c. Travel	\$ 0.00	\$ 0.00	\$ 21,673.00	\$ 0.00	\$ 21,673.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 2,400.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 2,400.00
f. Contract	\$ 8,520.08	\$ 76,774.00	\$ 27,400.00	\$ 73,000.00	\$ 811,940.08
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other	\$ 9,500.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 9,500.00
i. Total Direct Charges	\$ 40,164.40	\$ 76,774.00	\$ 58,736.60	\$ 73,000.00	\$ 874,921.00
j. Indirect	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 40,164.40	\$ 76,774.00	\$ 58,736.60	\$ 73,000.00	\$ 874,921.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

**BUDGET JUSTIFICATION FOR
FORMULA GRANTS**

U.S. DEPARTMENT OF ENERGY



BUDGET JUSTIFICATION FOR FORMULA GRANTS

Applicant: State of Nevada
Award number: EE0006168

Budget period: 07/01/2016 - 06/30/2017

1. PERSONNEL - Prime Applicant only (all other participant costs are listed in 6 below and form SF-242A, Section B. Line 6.f. Contracts and Sub-Grants).

Positions to be supported under the proposed award and brief description of the duties of professionals:

<u>Position</u>	<u>Description of Duties of Professionals</u>
Program Manager	This position is responsible for the overall management of the state's program including; developing program policy and procedures, developing budgets, awarding Subgrantee funds, negotiating independent contracts, ensures compliance with state/federal rules and regulations, supervising other NHD Weatherization staff, review Subgrantee performance and financial oversight.
Training and Technical Assistance Coordinator	This position is responsible for providing field and classroom training to all of the program's subgrantees and their contractors. The position is also responsible for updating the training manuals. Also performs on-site field monitoring and works with subgrantee staff on methods to improve quality and effectiveness in the field.
Grants and Projects Analyst II	GPA II is responsible for database entry, subgrantee file and office review and day to day correspondence with clients and subgrantees. Also responsible for Subgrantee Administrative Manual and administrative form updates.

Direct Personnel Compensation:

<u>Position</u>	<u>Salary/Rate</u>	<u>Time</u>	<u>Direct Pay</u>
Program Manager	\$65,046.00	12.0000 % FT	\$7,805.52
Training and Technical Assistance Coordinator	\$53,731.00	12.0000 % FT	\$6,447.72
Grants and Projects Analyst II	\$50,235.00	12.0000 % FT	\$6,028.20
		Direct Pay Total	\$20,281.44

2. FRINGE BENEFITS

a. Are the fringe cost rates approved by a Federal Agency? If so, identify the agency and date of latest rate agreement or audit below, and attach a copy of the rate agreement to the application.

b. If a. above does not apply, please use this box (or an attachment) to further explain how your total fringe benefits costs were calculated. Your calculations should identify all rates used, along with the base they were applied to (and how the base was derived), and a total for each (along with grand total). If there is an established computation methodology approved for state-wide use, please provide a copy. Also, please fill out the table below with the Fringe Benefits Calculations.

The cost basis is determined by the state Administrative Personnel Department and differs for each State employee. The fringe benefit package for the State of Nevada is based on position, grade, employer/employee or employer paid specific rates benefits package. Benefits packages can range from approximately 37-50%. This variation is due to the employees retirement choice of employee/employer paid or employer paid only, Health Insurance rates of the employees choice of the HMO or Self-funded programs and when the employee started in state service as the retirement packages have changed over the years:

Group Ins. Varies	\$700-900 monthly/person-varies
Retirement	.14 - .28 gross salary
Workers Comp	.012 of gross salary
Personnel Assessment	.006 of gross salary
Unemployment Ins	.001 of gross salary
Payroll Assment	.001 of gross salary
Retirement Group Ins.	.021 of gross salary
Medicare	.015 of gross salary

Fringe Benefits Calculatlons

Position	Direct Pay	Rate	Benefits
Program Manager	\$7,805.52	46.7069 %	\$3,645.72
Training and Technical Assistance Coordinator	\$6,447.72	49.8762 %	\$3,215.88
Grants and Projects Analyst II	\$6,028.20	37.5714 %	\$2,264.88
		Fringe Benefits Total	\$9,126.48

3. TRAVEL

- a. Please provide the purpose of travel, such as professional conference(s), DOE sponsored meeting(s), project management meeting, etc. If there is any foreign travel, please identify.

Purpose of Trip	Number of Trips	Cost Per Trip	Total
Fall Peer Exchange Phoenix 1 person 4 days air travel from Las Vegas to Phoenix	1	\$1,297.00	\$1,297.00
NASCSP - Fall conference Omaha NE	1	\$1,880.00	\$1,880.00
Subgrantee Office Review and Financial Review Ely - 2 person 2 Days. If able to schedule their visit together the cost of mileage and car will be less and budget will be adjusted	2	\$650.00	\$1,300.00
QCI Training in Phoenix at Southwest Building Science Training Center. 5 days. 1 Person, NHD Staff - Auditor	1	\$3,200.00	\$3,200.00
Subgrantee Office Review and Financial Review - Las Vegas and Henderson, NV 2 trip 2 people 4 days	2	\$2,172.00	\$4,344.00
On site field inspections, Reno and Carson City - 1 Person, 4 days travel by air from LV to Reno	2	\$1,400.00	\$2,800.00
Fall Peer Exchange, Phoenix, 1 person from Reno to PHX	1	\$1,540.00	\$1,540.00
On Site Inspections Las Vegas to Ely, Elko and surrounding rurals - Driving 1 person 4 days	1	\$1,000.00	\$1,000.00
Various Day trips for monitoring and meeting locally in Las Vegas, Reno and Carson City. This includes visits for technical support, office review, local monitoring for both field staff, financial and office/administrative assistance. Approximately 1-2 trips a month at \$40	20	\$.40.00	\$800.00
ACI 1 person 5 days (location unknown at this time) April 2017	1	\$3,512.00	\$3,512.00
		Travel Total	\$21,673.00

- b. Please provide the basis for estimating the costs, such as past trips, current quotations, Federal Travel Regulations, etc. All listed travel must be necessary for the performance of the award objectives.

Costs are based on approved GSA and state travel reimbursement rates, motorpool, airline, parking, ground transportation, meals and registration and tutorials. All are based GSA and other rates as of March 1, 2016, these are only estimates. Trips may need to be adjusted or reimbursed by other discretionary or utility funding sources if budgets are exceeded. Certain costs such as PAC, Public Hearing and DOE required meetings are DOE requirements only and can only be charged to DOE. At this time it is unknown if there will be any other DOE required meetings for the program manager or if there will be a DOE Conference, therefore funds have not been budgeted for these activities.

4. **EQUIPMENT** - Equipment is generally defined as an item with an acquisition cost greater than \$5,000 and a useful life expectancy of more than one year. Further definitions can be found in 10 CFR 600.

a. List all proposed equipment below and briefly justify its need as it applies to the objectives of the award.

Equipment	Unit Cost	Number	Total Cost	Justification of Need
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b. Please provide a basis of cost such as vendor quotes, catalog prices, prior invoices, etc. and justify need. If the Equipment is being proposed as Cost Share and was previously acquired, please provide the source and value of its contribution to the project and logical support for the estimated value shown. If it is new equipment which will retain a useful life upon completion of the project, provide logical support for the estimated value shown. Also, please indicate whether the Equipment is being used for other projects or is 100% dedicated to the DOE project.

no equipment purchases are planned with DOE funding

5. **SUPPLIES** - Supplies are generally defined as an item with an acquisition cost of \$5,000 or less and a useful life expectancy of less than one year. Supplies are generally consumed during the project performance. Further definitions can be found in 10 CFR 600.

a. List all proposed supplies below, the estimated cost, and briefly justify the need for the supplies as they apply to the objectives of the award. Note that all direct costs, including Supply items, may not be duplicative of supply costs included in the indirect pool that is the basis of the indirect rate applied for this project.

General Category	Cost	Justification of Need
Miscellaneous Supplies and Services	\$2,400.00	
Materials and Supplies Total	\$2,400.00	

b. Please provide a basis of cost for each item listed above and justify need. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

based on historical data Each year supplies such as toner cartridges, office supplies, folders, paper, envelopes, binders etc need to be purchased that are typically expended over the course of the year. These items are purchased as needed but it is estimated that the monthly cost to the DOE funded program is approximately \$200 and is based on the prior year's expenses.

6. **CONTRACTS AND SUBGRANTS** - Provide the following information for New proposed subrecipients and subcontractors. For ongoing subcontractors and subrecipients, this information does not have to be restated here, if it is provided elsewhere in the application; under Name of Proposed Sub, indicate purpose of work and where additional information can be found (i.e. weatherization subgrants, Annual File section II.3).

Name of Proposed Sub	Total Cost	Basis of Cost*
QCI and Other Training	\$12,420.92	The cost above is for training for DOE specific inspector requirements such as QCI, LRRP, etc. NHD has a vacant position for a WAP Inspector/Training & Technical Assistance Specialist. If a qualified individual is found who is already certified these costs would not be necessary and would be adjusted downward and remaining funds will be allocated into program operations to complete more units..

Subgrantees	\$776,940.00	HELP of Southern Nevada (HELP) \$341,854 Community Services Agency (CSA) \$120,426 Rural Nevada Development Corp(RNDC) \$93,232 Nevada Rural Housing Authority (NHRA) \$ 62,155 Las Vegas Urban League (LVUL) \$159,273 Overall State funding cost basis was based on population in each service area with information provided by State of Nevada Demographer's website based on 2010 census data and adjusted to 2015 estimates. Due to the costs of delivery in the rural areas of Nevada and the large driving distances and the costs to provide service in these areas an additional 2% is being provided to the two rural service providers.
IT Contracts, Database Development and Maintenance	\$15,000.00	The above cost will be for IT contract with the EERC who is the approved vendor to provide NHD with a new database and energy audit tool. Total cost for the annual service is \$32,000 approximate.
Equipment Maintenance Contracts	\$2,579.08	Historical Data and current year invoices Equipment maintenance contracts for printers, copiers, etc.
Legal	\$5,000.00	This is the cost of legal counsel to participate in state plan and PAC meetings, review contracts, request for proposals, request for quotations, awards, etc. and is based on historical and annual costs.
Contracts and Subgrants Total	\$811,940.00	

*For example, Competitive, Historical, Quote, Catalog

7. OTHER DIRECT COSTS - Other direct costs are direct cost items required for the project which do not fit clearly into other categories. These direct costs may not be duplicative of costs included in the indirect pool that is the basis of the indirect rate applied for this project. Examples are: conference fees, subscription costs, printing costs, etc.

a. Please provide a General Description, Cost and Justification of Need.

General Description	Cost	Justification of Need
Dues and Registration	\$3,500.00	NASCSP Dues NASCSP - Registration
Printing, postage, outreach, utilities, phones, association membership, rents etc	\$6,000.00	Costs are estimated from prior year costs and are for other direct costs not budgeted elsewhere. All costs included in Other Direct Costs are properly segregated from indirect costs to ensure there are not duplicate charges. All costs proposed are being used in support of the WAP program.
Other Direct Costs Total	\$9,500.00	

b. Please provide a basis of cost for each item listed above. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

These costs are based on prior year(s) costs NASCSP dues, periodicals, publications. Also included are printing charges for WAP flyers, outreach, quality control postcards, postage, printing of field manuals, materials for LSW and Mold awareness classes. Costs are based on prior purchases of similar or like items. All costs included in Other Direct Costs are properly segregated from indirect costs to ensure there are not duplicate charges. All costs proposed are being used in support of the WAP program.

8. INDIRECT COSTS

a. Are the indirect cost rates approved by a Federal agency? If so, identify the agency and date of latest rate agreement or audit and provide a copy of the rate agreement.

b. If the above does not apply, indicate the basis for computation of rates, including the types of benefits to be provided, the rate(s) used, and the cost base for each rate. You may provide the information below or provide the calculations separately.

Indirect costs are not being requested on this application for federal assistance.

The name and phone number of the individual responsible for negotiating the State's indirect cost rates.

Name:

Phone Number:

WEATHERIZATION
ANNUAL FILE WORKSHEET

**U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET**

(Grant Number: EE0006168, State: NV, Program Year: 2016)

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Community Services Agency (Reno)	\$120,426.00 12
HELP OF SOUTHERN NEVADA (LAS VEGAS)	\$341,854.00 36
Las Vegas-Clark County Urban League (North Las Vegas)	\$159,273.00 16
Nevada Rural Housing Authority (Carson City)	\$62,155.00 6
Rural Nevada Development Corp. (Ely)	\$93,232.00 9
Total:	\$776,940.00 79

IV.2 WAP Production Schedule

Weatherization Plans	Units
Total Units (excluding reweatherized)	79
Reweatherized Units	0

Note: Planned units by quarter or category are no longer required, no information required for persons.

Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	79
C	Total Units Reweatherized	00
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	79
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F	Total Funds for Program Operations	\$537,246.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	79
H	Average Program Operations Costs per Unit (F divided by G)	\$6,800.58
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$6,800.58

IV.3 Energy Savings

Method used to calculate savings: <input checked="" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below)			
	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	79	29.3	2315
Prior Year Estimate	74	30.5	2257
Prior Year Actual	22	30.5	671
Method used to calculate savings description:			
DOE Program			

**U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET**

(Grant Number: EE0006168, State: NV, Program Year: 2016)

Energy savings based on WAP algorithm:	
Total DOE State WX Allocation	\$874,921(a)
Total Cost Associated with Admin, T&TA, Financial and Energy Audits	258,675(b)
Subtract (b) from (a)	\$616,246(c)
Average Cost per Home (includes H&S) total # of homes 79	\$6,750(d) Note: separate H&S budget
Divide (c) by (d)	91.00(e)
Multiply (e) by 30.5 MBTU	2,775(f)
All funding sources	
total funds - all sources	\$5,500,000(g)
total admin	756,165(h)
total remaining	\$4,743,835(i)
average cost per home state average	\$ 6,000(j)- average does not include H&S
total estimated homes	702 (k)
multiply (k) by 30.5 MBTU for Total Annual Estimated Savings	21,411(l)

IV.4 DOE-Funded Leveraging Activities

DOE funds have not been specifically budgeted for the leveraging of non-federal sources of funds.

IV.5 Policy Advisory Council Members

Check if an existing state council or commission serves in this category and add name below

Betsy Ransdell, Energy Assistance Program Specialist	Type of organization: Unit of State Government Contact Name: Phone: 7756840552 Email: bransdell@dwss.nv.gov
Debra Parra, LIHTF Program Manager	Type of organization: Unit of State Government Contact Name: Phone: 7756872041 Email: dparra@housing.nv.gov
Kimberly Lukasiak, Senior Analyst	Type of organization: Contact Name: Phone: 7023643176 Email: kimberly.lukasiak@svg.com
Michele Montoya, Operations Manager	Type of organization: Non-profit (not a financial institution) Contact Name: Phone: 7757866023 Email: mmontoya@csareno.org
Shery Manning, Executive Director	Type of organization: Unit of State Government Contact Name: Shery Manning Phone: 7756848619 Email: smanning@dhhs.nv.gov

IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF-424)

Date Held	Newspapers that publicized the hearings and the dates the notice ran
04/13/2016	A copy of the public posting is attached to the SF-424. The Public Hearing Posting Notice complies with NRS 232.2175 and NRS 241.015 and is detailed below. The process for posting public notices within the state of Nevada and according to Business and Industry directives is as follows: The Nevada Housing Division does not publish advertisements in any publications and this has been the process for several years and has been very effective. By posting to the Nevada's Public Notice Website and also the Nevada Housing Division Website Hearing adequate public notice is given to interested parties and is common practice of public notices throughout the state agencies of Nevada. The Public Hearing was publicized by posting a notice on two websites and a total of 5 physical locations and by emailing to all current subgrantees and other interested parties. The Public Hearing notice was posted on March 24, 2016 and was noticed in the following places; posted on the Nevada Housing Division Website, Nevada's Public Notice Website Nevada Housing Division's Offices in Northern & Southern Nevada State of Nevada, Department of Business and Industry, Carson City and Las Vegas State Library and Archives, Carson City Notices have been sent to current subgrantees and all interested parties and agencies. Minutes from the public hearing are attached to the SF424 document.

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET

(Grant Number: EE0006168, State: NV, Program Year: 2016)

IV.7 Miscellaneous

Recipient Business Officer - CJ Manthe, Administrator, Nevada Housing Division cjmanthe@housing.nv.gov, phone 775-687-2046, 1535 Old Hot Springs Rd, Suite 50, Carson City, NV 89706

Recipient Principal Investigator - Suzanne M. Martin, Weatherization Program Manager, Grants & Projects Analyst III, Nevada Housing Division suemartin@housing.nv.gov, phone 775-687-2037, 1535 Old Hot Springs Rd, Suite 50, Carson City, NV 89706

The Policy Advisory Council meets at least once a year; in the Spring to review the DOE State Plan and to attend to any other pending business. If there is a Fall meeting, it is set to review year to date production and end of year production from the prior year and to see if Subgrantees met their goals for the prior fiscal year and to see if they are on track for the current year.

PAC Members fill the following categories:
Michele Montoya- Subgrantee Representative
Debra Parra At Large
Kimberly Lukasiak- Utility
Sherry Manning - Persons with disabilities
Betsy Ransdell - Low Income

Minutes from the PAC and Public Hearing are an attachment to the SF 424

U.S. Department of Energy

WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION

State: NV Grant Number: EE0006168 Program Year: 2016

Name:	Community Services Agency	Contact:	Cloyd Phillips
		DUNS:	010975894
Address:	PO Box 10167	Phone:	(775) 786-6023
	Reno, NV 89510	Fax:	() -
		Email:	cphillips@csareno.org
Counties served:	WASHOE County	Tentative allocation:	\$ 120,426.00
		Planned units:	12
		Type of organization:	Non-profit organization
		Source of labor:	Contractors
		Congressional districts served:	<u>CD</u> NV-02

Name:	HELP OF SOUTHERN NEVADA	Contact:	TERRIE D'ANTONIO
		DUNS:	165099326
Address:	1640 E FLAMINGO ROAD	Phone:	(702) 795-0575
	LAS VEGAS, NV 89119-5280	Fax:	() -
		Email:	td'antonio@HELPSONV.org
Counties served:	CLARK County	Tentative allocation:	\$ 341,854.00
		Planned units:	36
		Type of organization:	Non-profit organization
		Source of labor:	Contractors
		Congressional districts served:	<u>CD</u> NV-01

Name:	Las Vegas-Clark County Urban League	Contact:	Kevin Hooks
		DUNS:	148299733
Address:	3575 W Cheyenne Ave, Ste #101	Phone:	(702) 473-5000
	North Las Vegas, NV 89032-0000	Fax:	() -
		Email:	khooks@lvul.org
Counties served:	CLARK County	Tentative allocation:	\$ 159,273.00
		Planned units:	16
		Type of organization:	Non-profit organization
		Source of labor:	Contractors
		Congressional districts served:	<u>CD</u> NV-01

Name:	Nevada Rural Housing Authority	Contact:	Gary Longaker
		DUNS:	787020945
Address:	3695 Desatoya Drive	Phone:	(775) 887-1795
	Carson City, NV 89701-0000	Fax:	() -
		Email:	glongaker@nvrural.org
Counties served:	STOREY County	Tentative allocation:	\$ 62,155.00
	CARSON CITY	Planned units:	6
	CHURCHILL County	Type of organization:	Non-profit organization
	LYON County		
	DOUGLAS County	Source of labor:	Contractors
		Congressional districts served:	<u>CD</u> NV-02

14

U.S. Department of Energy

OMB Control No: 1910-5127

WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION

Expiration Date: 11/30/2016

State: NV Grant Number: EE0006168 Program Year: 2016

Name:	Rural Nevada Development Corp.	Contact:	Jerry Martin
		DUNS:	799925276
Address:	1320 Aultman Street Ely, NV 89301-0000	Phone:	(775) 289-8519
		Fax:	() -
		Email:	jmartin8049@gmail.com
Counties served:	WHITE PINE County MINERAL County NYE County EUREKA County PERSHING County ELKO County LANDER County ESMERALDA County LINCOLN County HUMBOLDT County	Tentative allocation:	\$ 93,232.00
		Planned units:	9
		Type of organization:	Non-profit organization
		Congressional districts served:	<u>CD</u> NV-02
		Source of labor:	Contractors

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This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

Provide a description of the definition of income used to determine eligibility

Definition of income used is clients at or below 200% of Federal Poverty Level determined in accordance with criteria established by the Director of Office of Management and Budget. HHS guidance is used for providing services to Qualified Aliens. Nevada utilizes the Poverty Income Guidelines and Definition of Income provided by DOE annually which includes annual revisions that are then distributed to the subgrantees to use when qualifying clients for the DOE program.

The total number of eligible households estimated at 200% of poverty within the State of Nevada is approximately 350,000. Based on population in each service area with information provided by Nevada State Demographer's website from 2010 US Census estimates and 2016 projections. State population information is as follows: 68.5% in Clark County, 15.5% in Washoe County, 8% in Eastern Rural, and 8% in Western Rural. 4% of the DOE funds or approximately \$31,000 were swapped for the same amount of Fund for Energy Assistance and Conservation (FEAC) between HELP and the Eastern Rural Subgrantee RNDC. RNDC's service area has counties in the state that do not pay into the FEAC Program and due to a very minimal DOE allocation for RNDC many clients would go without services. Therefore, the funds were distributed in this manner for the benefit of the program recipients.

Subgrantees utilize a Client Eligibility Worksheet which gives preference to elderly, disabled and families with children under six years of age. Also, households with a high energy burden are given preference.

If there is a waiting list and a client is not served promptly, client eligibility documentation is reverified and updated every 12 months.

Where an applicant receives income for a part of the applicable tax year, their partial income may be annualized to determine eligibility.

Eligibility determination is outlined in the Subgrantee Administrative Manual utilized by all Subgrantees. This manual is reviewed annually and updated as needed. Poverty income guidelines are distributed annually and the Client Eligibility worksheet is also updated at that time. During the file monitoring, files are reviewed for all required documents. A copy of the Subgrantee Manual is being attached to this application.

Describe what household Eligibility basis will be used in the Program

The State's DOE funded program eligibility is based on income at or below 200% of the poverty level determined in accordance with criteria established by OMB.

All housing types (Single Family Dwellings, Mobile Homes, 2-4 Unit Multifamily Dwellings, and 5+ Units Multifamily Dwellings) can be weatherized. Owned and rented units may be weatherized.

Describe the process for ensuring qualified aliens are eligible for weatherization benefits

The state of Nevada WAP utilizes guidance provided by HHS under the Low-Income Home Energy Assistance Program (LIHEAP).

The guidance is as follows:

WAP services are provided only to U.S. citizens or qualified aliens.

"Qualified aliens" are defined in section 431 of Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), commonly known as the Welfare Reform Law. The Act covers the larger groups of legal immigrants (legal permanent residents, refugees, asylees, individuals paroled into the U.S. for a period of at least 1 year, individuals whose deportation has been withheld, individuals granted conditional entry, and certain individuals who are victims of domestic abuse). Qualified aliens are eligible to receive assistance and services under the LIHEAP program so long as they meet other LIHEAP program requirements.

As States set their eligibility requirements for LIHEAP-funded benefits, they are to ensure that they are in full compliance with Federal provisions related to

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verification of qualified alien status in providing services. State procedures for verifying U.S. citizenship or immigration status of applicants should be in accordance with the United States Department of Justice's (DOJ) Interim Guidance on Verification of Citizenship, Qualified Alien Status and Eligibility under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, published November 17, 1997 (62 FR 61344). In addition, States should refer to LIHEAP-IM-98-25, dated August 6, 1998, which discusses the DOJ Interim Guidance and its applicability under the LIHEAP program.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

The state defines "low income" as a household whose total gross income is at or below 200% of the national poverty income guidelines established by the Office of Management and Budget. The Nevada Housing Division (NHD) will ensure compliance with Section 440.16 (a & b) through the use of Nevada's Weatherization Application and Eligibility Determination Worksheet. Each application identifies the applicant's household income, age of all family members, fuel source and whether they are elderly, disabled, or of Native American descent. Priority assistance is granted to households whose members are elderly, disabled or contain children under 6 years of age. Priority is also given to high energy consuming dwelling units.

Only units weatherized September 30, 1994 and prior are eligible for re-weatherization.

NHD Subgrantee Administrative Manual outlines allowable eligibility documentation which could include pay stubs, Social Security benefits letter, and other applicable documentation of income.

Building eligibility determined by 440.22. For duplexes and up to 4 units the 50% rule applies in order to weatherize the entire dwelling. For 5+ units (multi-family) not less than 66% of the dwelling units must be eligible in order to weatherize the entire building. Benefits in rental units will accrue primarily to the low-income tenants residing in the units. The weatherization of non-stationary campers and trailers is not allowed. No undue or excessive enhancements are made on rental properties. On rental properties, a 50% landlord contribution is required for capital improvements, unless it is a repair item of less than \$2,000.

NHD utilizes a Weatherization Service Agreement which landlords or property managers are required to sign prior to work commencing, stating that rents cannot be raised due to work being done from weatherization for a minimum 1 year along with other tenant protections.

A copy of the State Historic Preservation Programmatic Agreement signed on by the Nevada Housing Division's Administrator on 10/29/10 and is attached to the SF-424.A Program Comment was issued by the ACHP on March 11, 2013 pursuant to 36 CFR 800.14(e), published in the Federal Register on March 14, 2013, and extends the duration of the existing 44 Programmatic Agreements – and any future agreements that may be executed under the prototype Programmatic Agreement – until December 31, 2020.

Describe Reweathering compliance

NHD has established a central database with all records from July 1998 (when NHD took over the program from the Welfare Division) through present day. All clients who request services are checked in the central database to see if they were previously weatherized. If they were weatherized with DOE funds on or after October 1, 1994 they are not eligible to be weatherized with DOE funds. When possible these clients can be reweatherized with other non-DOE funds. Preference is given to dwellings that have never received WAP services. Dwellings weatherized from September 30, 1994 and earlier are eligible for re-weatherization.

Describe what structures are eligible for weatherization

Single Family, manufactured housing and multi-family dwellings are all eligible for weatherization. Nevada does not weatherize travel trailers or other non-stationary campers that are registered with the Department of Motor Vehicles or are not considered permanent stationary housing.

Describe how Rental Units/Multifamily Buildings will be addressed

Rental units may be weatherized, however, a 50% landlord contribution is required for replacement of all capital improvement items such as HVAC equipment, windows and water heaters. 10 CFR 440.22 (b)(2) may be used on 2-4 units and 5+ units.

Based on recent direction from DOE staff, NHD will change its policy from requiring the owner of Single Family Dwellings rentals to pay the 50% landlord contribution. Instead, they will only be encouraged to pay the contribution but not required.

Renters' rights are protected from eviction by having the landlord sign the Landlord Weatherization Service Agreement that states they will not raise the rent due to WAP repairs that may have increased the value of the property. Also, landlords may not evict for other than normal circumstances but not due to the weatherization of the property garnering more rents on the open market. Rental units are protected in accordance with 440.22(b)(3) and renters rights are protected as specified in 440.22(b) 3 and (c)-(e) The Weatherization Service Agreement must be signed by the landlord or management company prior to

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work beginning.

Describe the deferral Process

A copy of NHD's deferral form can be found in the NHD's Health & Safety Policy which is attached to the SF 424.

Deferrals are required for a variety of reasons such as condition of the structure: building integrity or the ability to effectively weatherize the structure. Also if the dwelling is slated for redevelopment. If there are Health and Safety conditions that might exist but are able to be remedied by the homeowner, 30 days are given for the homeowner to correct. If 30 days pass and the problem has not been corrected the file is closed and the client can requalify and reapply when they have made the corrections to the property. When there are issues that cannot be corrected or there are unsafe conditions for the contractors staff (illegal substance abuse) the dwelling can be permanently deferred. If a property is beyond the scope of weatherization it may also be permanently deferred. When possible, the client is notified of other programs and agencies that might be able to address rehabilitation of the property. When properties are deferred the client is given a copy of the deferral form notifying them why the property is either temporarily deferred or permanently deferred. The client is asked to sign and acknowledge receipt of the form.

V.1.3 Definition of Children

Definition of children (below age): 6

V.1.4 Approach to Tribal Organizations

Recommend tribal organization(s) be treated as local applicant?

If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

Low income tribal members and other low income persons are treated equally. The Housing Division does not recommend nor are there sufficient funds to provide DOE weatherization funding directly to members of Native American tribes. Low income members of Native American tribal organizations will receive benefits equivalent to assistance provided to other eligible persons living within the program's service areas. Approximately 4% of Nevada's population is comprised of individuals of Native American descent.

V.2 Selection of Areas to Be Served

The service areas proposed for the program year are based on the following: the estimated number of eligible households located in each county; the availability of funds to provide assistance to the rural counties, the ability to integrate weatherization assistance with housing rehabilitation projects and the availability of qualified service providers. The Weatherization Program's service area will include service to all areas and counties within the state and revenue streams have been adjusted to assure sufficient funds are available to provide assistance in the rural areas of the state. There are five service areas:

Clark County contains 68.5% of the state's eligible population and has been divided into two service areas: They are (1) the City of Las Vegas, the City of Henderson and southern rural Clark County; and (2) the City of North Las Vegas and northern rural Clark County.

(3) Washoe County comprises 15.5% of the eligible population and is a separate service area.

(4) The western rural service area which is comprised of Carson, Churchill, Douglas, Lyon and Storey counties and contains approximately 8% of the eligible population.

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(5) The eastern rural service area which is comprised of Esmeralda, Elko, Eureka, Humboldt, Lander, Lincoln, Mineral, Nye, White Pine and Pershing counties contains 8% of the states eligible households.

The total distribution of Weatherization funding is mostly based on population, except in eastern and western rural service areas. In these areas an additional 2% each was provided to assist with the higher costs of doing business in remote areas of the state.

V.3 Priorities for Service Delivery

Priority is given to the elderly, persons with disabilities, families with children under 6 and high energy users. Priority assistance is determined by a point evaluation matrix which awards additional points to high residential energy users or households with a high energy burden due to the utilization of heating oil or propane as their primary source of heating.

V.4 Climatic Conditions

Nevada's climate varies dramatically from north to south. Perhaps the clearest indicator of the climatic conditions being addressed by the Weatherization Program are the number of heating and cooling degree days associated with each area scheduled to receive weatherization assistance. Typically the northeastern portion of the state has the highest number of heating degree days while Clark County has the highest number of cooling degree days. Listed below are the heating and cooling degree days associated with the various service areas of the state:

*** Average Heating Degree Days (Base 65 F)**

Clark County & Henderson 2,601

Western Service Area & Washoe County 6,022

Eastern Service Area 7,236

*** Average Cooling Degree Days (Base 78 F)**

Clark County & Henderson 3,201

Western Service Area & Washoe County 508

Eastern Service Area 320

*Source: Mechanical Engineering Department
University of Nevada – Reno

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

The Nevada Housing Division worked with the Southwest Building Science Training Facility to update our field guides to align specifications, objectives and desired outcomes outlined in the Standard Work Specifications for Home Energy Upgrades (SWS). The new Field Guide, aligned with the SWS, has been approved by DOE and went into effect on July 1, 2015, at the beginning of PY 15. It can also be accessed at: <http://housing.nv.gov/programs/Weatherization/>

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The State of Nevada Program Assurances have been updated to include language that all DOE funded units shall be inspected by a Quality Control Inspector (QCI) for its final inspection ensuring that all work meets the minimum specifications outlined in the SWS in accordance with Weatherization Program Notice 15-4.

The program's Subgrantees are responsible for the installation of the measures approved during the DOE energy audit/priority list 5 year re-approval dated (dated May 3, 2012) and all work done is consistent with NHD's DOE approved energy audit and materials used are consistent with Appendix A - Standards for Weatherization Materials. The energy audit tool used to develop priority lists was REM developed by Architectural Energy Corporation. Typical Measures include:

1. Insulation: ceiling, floor, side wall and duct.
2. Duct leakage sealing (return, plenum and supply systems).
3. Shell infiltration sealing; i.e., replace broken glass, window and exterior door replacement, door weather-stripping, caulking, and evaporative cooler covers.
4. Insulation of water heater and water heater pipes.
5. Low-flow showerheads.
6. Solar screens (Southern Nevada)
7. Minor home repairs.
8. Heating and cooling system repairs and/or replacements. (replacements for efficiency must be run through REM)
9. Compact fluorescent light bulbs.
10. Refrigerator replacement. (stand alone freezers, units with water or ice makers are not allowed)

Blower door diagnostics will be performed on each single family and mobile home unit receiving weatherization assistance to ensure compliance with Indoor Air Quality Standards. A blower door duct test will be done in multifamily buildings when changing out HVAC units. A combustion appliance safety inspection will be performed on each dwelling unit containing a combustion appliance (furnaces, water heaters, ovens, cook tops and gas dryers) when shell sealing will be performed. A final inspection will be performed by the program's Subgrantees on each home receiving weatherization assistance.

A REM audit is to be used for multifamily buildings and A-Typical residential properties.

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Single-Family : operating under Measures Lists and procedures last approved by DOE on May 3, 2012. The energy audit tool used to develop priority lists was REM developed by Architectural Energy Corporation.

Manufactured Housing : operating under Measures Lists and procedures last approved by DOE on May 3, 2012. The energy audit tool used to develop priority lists was REM developed by Architectural Energy Corporation.

Multi-Family : REM audit required on all multi-family and A-Typical housing stock. For FY 2015, non-DOE funds were used to weatherize multi-family units.

Comments

An energy audit software program (REM/Design) and blower door diagnostics was used to rank and identify the most cost-effective measures installed in each dwelling receiving assistance. This measure list (priority list) is based on a number of criteria such as: climatic zone, type and rate of utility, housing type, and type of heating and cooling system. NHD has developed a priority list for both northern and southern Nevada and for each housing type based on the results of the energy audit recommendation.

The energy audit program selected for Nevada's program lends itself to site-built single family and manufactured housing. The program is compatible with the Home Energy Rating software adopted by the Nevada State Energy office. When proposing to weatherize a multifamily complex an Energy Audit will be completed.

State program policy prohibits the installation of any conservation measures having an aggregate savings to investment ratio of less than one. The program's Weatherization Field Manual requires the measures to be installed in accordance with their relative savings to investment ratios. Exempt from the cost-effectiveness test are those measures related to reducing or eliminating any problems affecting a client's health or safety and related minor home repairs.

All work done is consistent with Nevada's DOE Approved Energy Audit and Standard Work Specification (SWS). Materials used are consistent with Appendix A (Standards of Weatherization Materials).

In preparation for the re-approval cycle Nevada is currently working with the University of North Dakota, Energy and Environmental Resource Center (EERC) to replace its energy audit software tool with a web based system. EERC was selected after an extensive review process of available energy audit software vendors. Nevada anticipate formally submitting for approval of its new energy audit tool early in program year 2016. Anticipated submittal date is between September 1 and October 31, 2016. This energy audit tool has already been approved by DOE for use in the State of North Dakota.

V.5.3 Final Inspection

In 2015 all individuals who perform final inspections and monitoring including subgrantee and Grantee (NHD) were required to be QCI certified. Nevada currently

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has 6 QCI certified persons (3 north and 3 in the south) with each of our 5 Subgrantees having at least one QCI certified person. NHD also had one person become QCI certified but that person has retired. Presently, NHD is recruiting for the weatherization inspector position but also anticipate being able to contract for QCI services until we again have a QCI staff person on board. Every unit reported to DOE is now being inspected by a QCI certified inspector and this will continue into PY 2016.

NHD provides to all Subgrantees a copy of relevant policies and procedures that govern the quality control inspection process in accordance with WPN 15-4 Section 3.

Every DOE WAP unit reported as a completed unit receives a final inspection ensuring all work meets the minimum specifications outlined in the SWS in accordance with 10 CFR 440.16(g)

If through statewide monitoring, a pattern of fails are evident, the responsible agency will receive disciplinary action and the possibility of the reallocation of current funding and the loss of future funding. The severity of the loss depends on the nature and severity of the failures.

In subgrantee agencies where the Auditor performs the audit, creates the work order and performs the final quality control inspection the Nevada Housing Division performs quality assurance reviews on at least 10% of all completed units. In agencies where the QCI has no prior involvement in the work on the home or the audit the NHD inspector performs at least 5% review of all completed units. However, the Nevada DOE program in some areas is so minimally funded that it does not allow for a separate auditor and inspector. Nevada does its best to serve all areas of the state with some areas only receiving a small portion of funding.

With the update of the new database, the audit and the final inspection shall all be web based and aligned with SWS ensuring that work is completed in accordance with the work quality requirements outlined in WPN 15-4 Section 1. Both the State staff and Subgrantees will be using this coordinated process for inspections and monitoring.

Final inspections are performed on 100% of the units weatherized at the Subgrantee level.

V.6 Weatherization Analysis of Effectiveness

Effectiveness of Subgrantee weatherization projects is assessed by their adherence to the priority lists approved by the Department of Energy and also by monitoring of completed units done by NHD. NHD sends out monthly quality assurance postcards to clients after weatherization is complete to receive feedback on their experience and interactions with subgrantee staff, contractors and NHD monitors. It provides good insight into program perceptions and expectations and if those expectations were met or how we can improve these interactions.

Productivity and energy savings between Subgrantees is not compared as housing stock is dissimilar in different areas of the state and also varying funding which is based on population. Subgrantee production is compared to projected or expected outcomes that NHD establishes when grant funding is awarded. Benchmarks are established by NHD and evaluated quarterly. If the Subgrantee is not meeting expected benchmarks NHD meets individually with that subgrantee to see how production can be ramped up and what are the obstacles to be overcome.

When a subgrantee is not meeting their goals and also during office and field monitoring NHD assesses what T&TA activities are required. Each year subgrantees are queried on T&TA needs. Also, during the annual subgrantee meeting, time is devoted to T&TA questions subgrantees might have and observations of NHD staff found during field and office visits.

Training capability is assessed in the field during monitoring visits. A Summary Field Report is completed after each visit and there is an exit interview with subgrantee staff outlining strengths and weaknesses. A plan of corrective action is required within 30 days when findings were noted.

All subgrantee field staff must be BPI certified. Training by NHD is ongoing and takes on formal and also informal training. If a contractor's work is found not to be up to standard they are shown the correct way to install. All work completed in the field is done by licensed contractors who are aware of

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building and code requirements and must work to those standards. All final inspections and field monitoring will be done by a QCI certified staff member. Work in the field will need to be done to meet the Standard Work Specifications (SWS) adopted by NHD and approved by DOE.

Performance reviews are done as stated above with summary reports of finding which must be responded to within 30 days. NHD spot checks any work that did not pass inspection. Work is done at the contractors expense.

NHD is constantly reviewing our management mechanisms and will affect change when necessary or when problems are observed.

Every year a financial review of all subgrantees is undertaken by NHD Audit/Accounting Staff. All subgrantee financial systems and processes are reviewed at that time.

During the annual file review the Grantee conducts a review of the invoiced costs to ensure that no duplicate billing has been done and that all costs billed are based on the approved costs. NHD conducts annual or biennium cost surveys on the major component costs such as HVAC, windows, water heaters, etc. Subgrantees are required to engage in a competitive bid process with 5 - 1 year extensions allowed. The bid process was developed with assistance from Susan White in PY 2013.

Subgrantees must be successful in administrating cost effective programs designed to assist the program's targeted population. Monitoring reports, financial audits, on-site inspections and client survey reports indicate if subgrantees are administer cost effective programs and are in compliance with state and federal rules and regulations.

All subgrantee agency staff receive basic weatherization training, blower door diagnostics, combustion appliance testing, energy auditing, inspection protocol and Lead Based Paint Weatherization Practices. All agencies must have staff members certified through the Building Performance Institute's Building Analyst series. Also all subgrantees must have at least one QCI on staff or under contract to meet the DOE program requirements.

Below is an analysis of the current program the Subgrantees are administering through February 29, 2016. Subgrantees have until June 30th to complete Production and until July 15, 2016 to report it to NHD:

SUBGRANTEE	GOAL	PRODUCTION THROUGH FEBRUARY 29, 2016
URBAN LEAGUE	11	9
NRHA	4	0
HELP	36	14
CSA	11	2
RNDC	13	6
TOTALS	75	31

All Subgrantees anticipate spending out but a couple are a little slow at rolling out their DOE funding but each has qualified applications and work is in process. However, one Subgrantee, Rural Nevada Development Corporation (RNDC) is currently At Risk, which is discussed in Sections V.8.3 and V.8.4 of this Master File.

V.7 Health and Safety

Health and Safety document is being submitted as an attachment to this application.

At Risk occupants are defined as elderly clients, children under 6 years, or a person with health issues which can be documented with a doctor's note.

Heating systems can be replaced if the existing is red tagged or dangerous (high CO levels or cracked heat exchanger) and the existing system is beyond repair or can be repaired but only at a comparable or greater cost than replacement. A heating system can be installed in the absence of a permanent adequate heating system.

Cooling systems can be replaced and billed to Program Operations for age with REM justification when the SIR ≥ 1.0 . An inoperable or inadequate cooling system can be replaced through H&S when the client is at risk per the above definition and when the equipment cannot hold a refrigerant charge or when it cannot maintain a room temperature of at least 80° F.

Nevada's costs for Health and Safety is 14.8% of the 6,750 average cost per unit and is based on current costs and data now available for the ASHRAE ventilation requirements. A detailed overview of the costs can be found in the H&S plan attached.

NHD has an intake procedure in place that captures pre-existing occupant health conditions and is called a Health Assessment Form. Deferral policies were discussed previously in this document and are also included in the attached H&S document.

V.8 Program Management

V.8.1 Overview and Organization

The Weatherization Assistance Program is administered within the Nevada Housing Division (NHD), a division of the state's Department of Business and Industry. NHD utilizes tax-exempt and taxable mortgage revenue bonds to provide a source of mortgage revenue that cannot be supplied by the private sector

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to low and moderate income households. NHD administers the Single and Multi-Family Bond Programs, Loan Servicing Program, HOME Program and the Low Income Housing Trust Fund along with the Neighborhood Stabilization Program.

NHD has been able to utilize HOME and Housing Trust Funds to compliment its Weatherization Assistance Program. NHD also uses funding provided by the Governor's Office of Energy (GOE) to augment the state's Program. Whenever possible NHD tries to leverage various funding sources in projects to allow for more measures and added energy savings, choosing the best funding source(s) for each project to maximums benefits.

Currently there are three full time positions funded through the state's Weatherization Program; Program Manager, Grants and Projects Analyst and a T&TA Compliance Auditor. The Compliance Auditor position is presently vacant but should be filled soon.

The Nevada Housing Division does not directly administer the State Energy Program or the LIHEAP program although NHD receives a 5% pass through of LIHEAP funds annually from HHS.

NHD has a Subgrantee Administrative Manual that is reviewed annually and updated as necessary. The manual includes overall program management which includes inventory control, the application process, database operation, management, procurement and other necessary program information.

A copy of the NHD organizational chart is included as an attachment.

V.8.2 Administrative Expenditure Limits

NHD intends to award an additional 5% administrative funds to subgrantees receiving \$350,000 or less of DOE weatherization funds. This decision is based on the relatively high costs associated with the program's administrative, financial management, and operating costs. In recent years, administrative costs have continued to rise and in some cases Subgrantees have had to subsidize their federal programs with other resources available to their agency. Due to the high costs, one of the smaller Subgrantees decided not to participate in the program last year because all of the new DOE requirements. They stated they cannot afford to pay a staff person what they want after receiving all the new certifications and training. They further stated that in the past years they have had to subsidize the staff person's salary through other discretionary funding available to them and they did not want to continue that practice. Other subgrantees accept the 10% admin but feel it is becoming more and more difficult to make this program pencil.

NHD utilizes 5% administration for DOE WAP and currently has only 3 employees as our agency does not receive general funding to subsidize salaries.

V.8.3 Monitoring Activities

Monitoring of Subgrantees encompasses monitoring policy and procedures outlined in WPN 16-4.

Each subgrantee is responsible for administering their program in accordance with the rules and regulations established in 10 CFR, Part 440 and 2 CFR, Part 200, applicable OMB circulars, Weatherization Program Notices and other procedures DOE may require.

All subgrantees receiving WAP funding are monitored annually and the monitoring encompasses the following:

- Financial/Administrative/Procurement
- Equipment/Inventory/Materials
- Eligibility
- Quality Assurance
- Records Retention
- Qualifications and Training
- Feedback and Reporting
- On-Site Inspections
- Assessments, Energy Audits and adherence to Priority Lists
- Health & Safety

Office and Financial Review:

The Nevada Housing Division (NHD) conducts a comprehensive Office and Financial Review of each subgrantee at least once annually utilizing NHD's monitoring document. The visit consists of the following: file reviews of client files, insurance and maintenance records, financial desk review and annual review of financial statements, inspection of tools and equipment, and procurement practices. Any required subsequent visit will include a review of corrective action taken on prior findings. The Grants and Projects Analyst II performs the file review and accounting/audit staff from NHD perform the financial review.

Files are reviewed with regard to income verification/eligibility, completion of all required forms, adherence to priority measures, prioritization of clients (elderly, disabled, children, etc.) and documentation of contractor invoices. Upon completion of the review, an exit interview is conducted with the agency's director or representative and a written report is submitted within 30 days following the review. The written report identifies any findings, required corrective action and deliverables within a specified time frame. NHD works with the agency in developing any training or technical assistance designed to correct the identified problems. Failure to comply with the report's recommendations or other corrective actions may result in the withholding of requested funds until resolution has been achieved. A questionnaire is sent to a sampling of clients receiving weatherization assistance requesting their comments and opinion on the assistance provided. These questionnaires are reviewed every couple of months by NHD staff and if necessary, forwarded to the respective agency for follow up. Work detailed above is the responsibility of the Grants and Projects Analyst II.

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Each subgrantee is required to have an agency-wide audit conducted at the close of their fiscal year, however, depending on funding the DOE program is not always reviewed. Any audit findings regarding the Federally Funded WAP program and corresponding resolutions will be reviewed by NHD accounting staff and forwarded to the agency's board chairperson. The Weatherization Assistance Program manager is responsible for monitoring subgrantee success. The amount of funds associated with the monitoring of Nevada's Weatherization Program are the costs associated with performing the activities listed above and related travel costs.

Description Of On-Site Monitoring: A minimum 5% field review is conducted that includes; measures installed by the subgrantees will be inspected by NHD compliance staff to ensure compliance with the specifications outlined in Appendix A of 10 CFR, Part 440 (Standards for Weatherization Materials) and approved DOE priority list. During the course of the monitoring visit, the prices being paid for materials are discussed and comparisons are made with respect to the contracted costs approved by the subgrantee at the onset of the program year. The prices paid for a specific item will vary from one subgrantee to the other depending on the availability of materials and the distance from the supplier. Pre and post-work inspections are randomly made by NHD staff during the course of the monitoring visit. These inspections are necessary to ensure the measures recommended by the energy audit/priority list are in fact being followed. On-site post inspections compare the measures listed on the priority list to the measures listed on the Building Weatherization Report. The priority list determines which measures are most cost effective and ranks them in ascending order. The priority list takes into consideration factors such as type of housing stock, heating/cooling degree days, cost of energy, and installed costs.

For on-site monitoring by the state and in cases where the subgrantee auditor performs the audit, creates the work order and performs the final quality control inspection, the grantee monitor will perform quality assurance reviews on at least 10 percent of all completed units. In the cases where the audit and final inspection are done by the same person NHD's QCI will ensure that the individual performing these tasks is able to consistently perform both tasks. The NHD QCI will evaluate that these processes are performed consistently and correctly or if additional training is required. In the larger subgrantee agencies where the duties of auditor and final inspector are segregated, NHD will perform a minimum of 5% inspections. In cases where significant deficiencies are found during the monitoring visit NHD will increase the number and frequency of these inspections. Field monitoring in the prior and current year have not revealed any significant deficiencies in either quality of work or final inspection processes.

When the local QCI fails to adequately inspect to the guidelines in the field guide additional training will be provided and a follow up visit will be performed within 30 days. If the follow up still reveals inconsistencies NHD will require that an independent QCI be hired by the subgrantee to do this task or DOE funds will be re-allocated to another subgrantee.

NHD monitoring will be performed by the State Monitor who will be QCI certified prior to undertaking any DOE inspections. In the event that the NHD Monitor is not QCI certified NHD will contract with a QCI certified third party. NHD has a full time permanent Compliance Auditor/Inspector position but this position is currently vacant due to a recent retirement. The position is paid for out of T&TA (please see the attached budget for review of % of salary). T&TA activities are outlined in the budget. NHD utilizes a Weatherization Inspection Form for all final inspections. The NHD Compliance Inspector conducts an exit interview and provides a written summary of field findings. Progress Reports or Report Cards provide an overall score for work in the field. Corrective action on all fails is required with 100% reinspection required by Subgrantee field staff. From time to time NHD includes re-inspections of these fails when out in the course of their regular monitoring. For the current program year, field monitoring has been ongoing and includes units in progress and also units completed within the past 60-90 days until the recent retirement of the inspector. However, inspections have continue through the use of contract inspection services provided by our retired inspector.

Through the course of the grant period, each subgrantee's financial status reports are continually reviewed to determine the actual program support, material and health/safety costs of the homes being weatherized. These reviews are necessary to ensure compliance with the average cost per unit weatherized established by DOE is not exceeded. NHD's average cost per unit may be less than the DOE allowed due to trying to maximize client services and also providing sufficient benefits to those clients. Subgrantee monthly expenditures are reported by budget category and reviewed by the program manager and accounting staff prior to reimbursement. The method of dealing with various problems which may arise between NHD and it's subgrantees is dependent upon the severity of the problem. Normally, NHD staff will contact the agency's director and discuss the nature of the problem, determine how and by whom the problem will be resolved and in what time frame. If it is determined the problem could be corrected through more in-depth training or technical assistance, NHD will recommend this course of action and ensure that funds are appropriated to do so. Should the problem remain unresolved, NHD's Administrator will contact the agency's Director and explain that failure to correct the problem could jeopardize future funding. Annually, the state will summarize and review each subgrantee's audit, monitoring reports and findings for internal assessment of State and subgrantee needs, strengths, and weaknesses. The results of this annual assessment will be re-evaluated during the annual planning process.

File, Office and Financial reviews are currently underway or planned. Prior year's financial reviews did not reveal any inconsistencies or issues of any waste, fraud or abuse.

At present on-site inspections have commenced for HELP of Southern Nevada, Community Services Agency, Nevada Rural Housing Authority, Rural Nevada Development Corporation, and the Las Vegas Urban League. More monitoring inspections have been scheduled for April 2016. Additional monitoring inspections will be scheduled as needed to meet the percentage inspection base on the final numbers.

Office Reviews have been completed on Las Vegas Urban League, HELP of Southern Nevada and Rural Nevada Development Corporation. These agencies that were monitored were in compliance with program regulations. However, we have been working with Rural Nevada Development Corporation (RNDC) that has had a couple of key staff members leave to bring the new staff members up to speed as quickly as possible. We have found several of the files lacking the necessary information and have required that this information be provided. Also we have conducted additional desk and on-site monitoring of project files. RNDC's Financial Audits were reviewed and there were not any findings.

The Financial Reviews of all agency are currently being planned by NHD's fiscal staff.

V.8.4 Training and Technical Assistance Approach and Activities

Training and Technical Training (T&TA) activities/funding will be used to support the Compliance Auditor/Inspector position at NHD plus QCI training of subgrantee staff, ASHRAE 62.2-2013, BPI certifications and other required meeting and trainings and monitoring activities. Funds will be allocated to send 1 NHD staff member to NASCSP's fall conference in September 2016 in Omaha, NE. The remaining T&TA funds will be used for other training and travel costs any BPI re-certification needs, EPA, Lead, contractor training and jurisdictional requirements/needs.

NHD will assess any ongoing T&TA needs of subgrantees based upon the findings related to federal and state program reviews, monitoring reports, monthly status reports, client

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satisfaction questionnaires, and financial and compliance audits. NHD monitoring is designed to maximize energy savings through the correct implementation and usage of the DOE approved priority list and energy audits for atypical housing stock and multi-family projects. T&TA funds will be provided to correct noted deficiencies and to improve the overall effectiveness of the subgrantees performance. As indicated earlier, T&TA activities will be limited by the amount of available funds. NHD requires at least 1 field staff member of each subgrantee maintain BPI and QCI certifications. As stated elsewhere in this plan all DOE completions must be inspected by a QCI certified inspector. Nevada has 5 subgrantees and 1 state monitor and Nevada requires a minimum of 1 QCI per subgrantee and 1 for the State which we think will be adequate coverage to complete all inspections. In the event that a subgrantee does not have a QCI certified inspector coverage will be provided by one of the other subgrantee QCI certified staff. Currently all subgrantees have at least 1 certified staff member.

NHD's compliance auditor maintains a training log and is aware when certifications are up for renewal. NHD provides the following mandatory in state trainings which enables the State Monitor to assess competency in the following disciplines: Basic Weatherization, Blower Door and Combustion Appliance Safety, Lead Safe Weatherization, Mold Awareness and Assessor/Inspector training and REM Design Training. These trainings are mandatory for new contractor and subgrantee staff within 6 months of hire. Prior to receiving training and evaluation by NHD the new hire is unable to work on a job without working with a senior staff person who has taken the required classes. Anyone unwilling to participate in these trainings is not able to work in Nevada's weatherization program.

NHD verifies that all required trainings (ASHRAE-2013, LSW and RRP) have been completed and certifications are up to date during our annual Office Review. We request to see copies of all licensing and certifications.

Both at the State and Subgrantee level inspectors were trained and received their QCI certifications. As new inspectors enter the program, QCI training will continue for new inspectors and any weatherization inspectors who have yet to pass the QCI testing.

The EPA Lead Renovator training is contracted out and certification is required for all subgrantee staff. Contractors are required to have Firm Status prior to working on any pre'78 housing stock. Additionally, contractor staff must receive renovator certification within 90 days of hire and cannot work on pre'78 housing stock until certification is received. All five (5) subgrantees and their contractors have received the Lead Renovator training and have certifications. All Contractors working on the program have Firm Status as required by the EPA. During the office reviews all required certifications and licensing are reviewed and are current.

The quality of field work is evaluated during each monitoring visit to ensure compliance with the SWS, Field Manual and all Policy and Procedures. All clients are provided with a copy of "Your Home Energy Savers Booklet". During the assessment process and the final inspection clients are counseled on how to conserve energy and about the measures which have been installed and how to properly maintain the measures installed.

NHD also reviews feedback from DOE monitoring, internal state reviews, QA visits and incorporates any feedback received. All recent recommendations or findings from the prior DOE visits have been addressed, resolved and responded to. The Database has been updated with all records (26,900) since the Nevada Housing Division took on the WAP program in the late 1990's. This database is used to confirm whether a project was weatherized previously.

NHD does not compare effectiveness and energy savings achieved between subgrantees as housing stock, heating and cooling degree days and funding vary for each subgrantee. NHD sets benchmarks with number of units, average cost per unit and energy savings and reviews quarterly to see if each subgrantee is on track.

Training is conducted on all housing stock including Manufactured Homes.

Program Outreach and Client Education Comments:

Subgrantees distribute the following printed materials to clients consistent with the Health and Safety Plan and NHD directives:

- A Brief Guide to Mold, Moisture and Your Home – EPA
- EPA Consumers Guide to Radon Reduction (when required in the service area).
- Asbestos in the Home: A Homeowner's Guide
- Health and Safety Notification, Acknowledgement and Assessment Form
- Deferral Form
- Lead-Safe Certified Guide to Renovate Right

For PY 2014 (July 1, 2014 - June 30, 2015), all of the subgrantees were monitored for field compliance, office review and file reviews and financial compliance. For PY 2015, field monitoring is ongoing, file, office and financial reviews are in process and will be completed by the end of the fiscal year.

Major findings:

There were no major findings such as waste, fraud and abuse from the prior monitoring visits and of the inspections/visits this year there have been no major findings. Although we have had an issue with Rural Nevada Development Corporation (RNDC), which has been going through some staff changes, where monitoring has discovered an ineligible DOE project due to it being over-income and funds are currently in the process of being paid back.

Trends with respect to findings, concerns or other issues:

No trends were noted or documented, minor issues with missing paperwork or permits if found were corrected with adding that documentation to the files if deficient. All subgrantees have staff with long history with the program and are aware of guidelines and seek assistance from NHD when it doubt. NHD holds annual meetings to discuss best practices, policies and considers potential solutions to identified problems.

Needed T&TA:

When Subgrantee staff BPI certifications are up for renewal CEU's are obtained from ongoing training opportunities. This year CEU's may be obtained at the EOW conference in Spring 2016, which has been budgeted in the current budget cycle.

Technical assistance is provided as needed. When new staff members are hired at the contractor or subgrantee level, NHD's compliance monitor schedules one on one training to assess the competency of the field staff and what training is needed. All new staff receive basic WAP, Blower Door and CAS training, inspector and assessor training that includes field and classroom indepth training. Also, ASHRAE 62.2-2013 training, LSW, REM Design, asbestos and mold awareness training are provided or contracted.

Programmatic and Administrative Training takes place during the annual Subgrantee meetings, through conference calls and also one on one during the office review. All subgrantee staff has been involved in the program for several years and therefore training is provided as needs are identified. NHD has an open door policy and is in constant communication with the subgrantees.

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All financial staff at the subgrantee level are seasoned employees and have been working on WAP for several years. Financial reviews are conducted annually and also the Financial Status Reports submitted monthly are reviewed monthly by NHD accounting staff and Subgrantees must conform to the new Uniform Administration Requirements (2 CFR Part 200) and GAAP principles. Subgrantee Financial Audits are reviewed annually by NHD accounting staff.

Subgrantees considered At Risk:

Currently one Subgrantee, RNDC, is considered At Risk due to recent changes of multiple staff members leaving the organization within less than a year's timeframe. They are presently behind in the expenditures and production in addition to there having been some issues with file documentation. Because of their At Risk status, NHD has been reviewing and monitoring all of their project files and providing direct training and technical assistance as much as possible. However, this subgrantee does appear to be turning the corner and NHD is hopeful they will finish the year strong because new internal management practices have been put into place. No other subgrantee is consider At Risk.

Outcome activities involving T&TA and monitoring training

All subgrantees provide 100% final inspection on all Weatherized units. All subgrantees provide 100% reinspection on any failed units. During DOE's last visit, no issues were found during the field inspections.

Client Education: Upon the completion of every weatherization a walk through is performed by the subgrantee inspector with the client prior to signing off the work completed in the home. This provides an opportunity to explain the proper operation and maintenance of the measures installed, warranty information and additional ways the client can save energy. Each client is provided with a copy of "Your Home Energy Savers Book" a publication containing low cost/no cost energy savings tips.

V.9 Energy Crisis and Disaster Plan

The State of Nevada does not intend to use DOE funds for Energy Crisis Relief.

ATTACHMENT
HEALTH AND SAFETY PLAN

**STATE OF NEVADA
DEPARTMENT OF BUSINESS & INDUSTRY
NEVADA HOUSING DIVISION**

WEATHERIZATION ASSISTANCE PROGRAM

HEALTH AND SAFETY PLAN

**State Fiscal Year 2017
DOE PY 2016**

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NEVADA HEALTH AND SAFETY PLAN

Health and Safety

Introduction:

The mission of the Weatherization Assistance Program is to increase the energy efficiency of dwellings owned or occupied by low-income persons while at the same time increasing their health and safety whenever possible. The Nevada WAP recognizes the importance of assessing and correcting health and safety concerns for the occupants, crew, and contractors when health and safety improvements are allowable and necessary for weatherization to occur. A limit has been imposed on health and safety expenditures to ensure the program maintains the primary goal of energy efficiency. Information on the NHD H&S proposed costs for PY 16 can be found on page 4 of this document. For PY 16 the limit is 14.8% of the average cost per measure of \$6,750.

Nevada's Health and Safety Plan addresses Health & Safety (H&S) issues in accordance with 10 CFR 440.16(h), 440.18(d)(15), and 440.21(5) and DOE's most recent Health and Safety Guidance Program Notices 11-6 and 11-6a.

Program notice 11-6 defines the topics and related activities DOE requires all Subgrantees to charge as H&S. WPN 11-6 also allows Grantees to redefine qualifying health and safety activities as "incidental repairs". Incidental repairs are those repairs necessary for the effective performance or preservation of weatherization materials and also require cost justification through the electronic energy audit. Once defined as incidental repair, these measures can not be charged as health and safety costs.

For budgeting purposes, H&S costs are charged to a separate H&S budget line item that does not include regular Program Operations and are therefore not included in the per unit average.

Subgrantees are allowed to utilize DOE funds for H&S purposes to ensure that weatherization activities do not cause or exacerbate health and safety conditions for occupants, workers, or create potential durability issues for the dwelling. Health and safety issues that are not associated with weatherization activities cannot be corrected with DOE funds. Subgrantees must seek other funding sources for these unrelated repairs. In accordance with 10 CFR 440 and WPN 11-6, allowable energy related health and safety measures or installations are those necessary to maintain the physical well being of both the occupants and/or weatherization workers where:

- Costs are reasonable per the definition below*
- AND
- the actions **MUST** be taken in order to effectively perform weatherization work,
- OR
- the actions are necessary because of weatherization activities

*Reasonable Costs: Cumulative unit H&S costs up to the allowed percentage of the state's actual annual per unit average as indicated below. This definition is to be applied in all cases where H&S costs are allowed unless the H&S measure also qualifies as an energy saving measure having an SIR \geq 1.

PY 16 Health and Safety Allowance: WPN 11-6 requires Grantees justify the Health and Safety limits requested in this plan.

The following information is based on Nevada's PY 2016 allocation of \$871,308 with an estimated 79 units weatherized at an average cost of \$6,750 per unit. The Health and Safety (H&S) budget is based on the current year's data. In the prior year, NHD estimated a per unit cost of \$1,000 average for H&S and for the upcoming program year we are requesting the same amount per unit for H&S costs. Listed below are the historical costs provided through Nevada's WAP service providers and current contractors:

$$\$1,000 \text{ (average cost per dwelling)} \times 79 \text{ units} = \$79,000$$

<u>Activity</u>	<u>Average Cost</u>	<u>Frequency</u>	<u>Estimated Cost</u>
LSW, OSHA, Other Testing	\$100/unit	25%	\$ 25.00
Carbon monoxide alarms	\$75/unit	65%	\$ 48.75
Cooling system R&R	\$5,000/unit	5%	\$ 250.00
Heating system R&R	\$2,800/unit	10%	\$ 280.00
ASHRAE 62.2 (exhaust fans)*	\$800/unit	50%	\$ 400.00
		Total:	\$1,003.75

Average Health and Safety cost per unit: \$1,004 rounded to \$1000

The above are not all of the potential health and safety activities that may be encountered; however, they are the ones which occur most frequently. Based on the historical data the average cost per unit for H&S expenses is estimated at \$1004.00 or 14.8% of the average cost per unit of \$6,750.

Expenses charged as health and safety measures do not require cost justification (meeting SIR \geq 1) and are not to be included as part of the overall job average. In cases where a health and safety measure can also be an energy efficiency measure, the measure must first be cost tested through the energy audit software and, when qualified, must be reported as an energy efficiency measure. For example, replacing a combustion atmospheric water heater with an unacceptable draft with a sealed combustion high efficiency unit produces an SIR of 1.3. This replacement qualifies as either a health and safety expense or as an energy conservation measure, but must be charged as an energy saving measure.

There are instances where necessary H&S concerns cannot be adequately addressed due to lack of accessibility, client refusal, budgetary constraints, inappropriate use of DOE weatherization funds and/or lack of other available funding. When such instances occur, deferral is required.

In all instances, the energy auditor, subgrantee weatherization crew and/or sub-contractors must evaluate on-site conditions to determine if any potential health and safety hazard should be remedied, referred to other agencies, result in partial weatherization services, or cause weatherization services to be deferred. The weatherization program is not an

abatement or remediation program and weatherization funds shall not be used for those purposes except on a case-by-case basis as indicated in this plan.

Grantee Health and Safety

NHD and subgrantee staffs whose responsibilities include entering clients' homes on a regular basis are required to follow safe work practices on job sites and receive training on health and safety topics that may affect them and/or the client. Trainings consist of, but are not limited to EPA LRRP Certification, Lead Safe Weatherization (LSW), asbestos awareness, mold awareness, radon awareness, etc.

Subgrantee, Crew/Contractor Health and Safety

OSHA 10 and 30 are no longer required per DOE WAP Memorandum 003, July 2014, and Nevada does not require compliance by the Grantees, Subgrantees and their contractors. However, Contractors and their staff are required by law to have these trainings and Subgrantees may or may not maintain such documentation from their contractors.

Agencies must provide personal protective equipment (PPE) to weatherization workers during projects that have known or suspected hazards. PPE includes, but is not limited to, eye and face and respirator protection. The agency is responsible for requiring personnel to wear appropriate PPE in all operations where there is an exposure to hazardous conditions or as required by OSHA.

Safety Data Sheets (SDS) for all products being used should be available on-site in a 3-ring binder; additionally the SDS must be posted for any materials being used that may contain hazardous products. Costs for local agencies to comply with on-site OSHA standards may be charged under health and safety, tools and equipment, or incidental repairs as appropriate and as approved in the subgrantee's grant award. All costs associated with contractor compliance with these requirements are the responsibility of the contractor.

Because of the wide range of activities involved in weatherizing a house, ensuring crew health and safety requires a broad knowledge of the appropriate OSHA standards. These should be consulted for further details. Other useful information may be included on Material Safety Data Sheets that identify potential health risks and describe the proper use, handling, and storage of a wide variety of materials, including some common weatherization materials. They also suggest personal protective equipment and address first aid measures.

Pollution Occurrence Insurance

Although not required by DOE, Nevada strongly recommends subgrantees carry appropriate Pollution Occurrence Insurance.

Client Health and Safety

Energy auditors and crews/subcontractors are required to take all reasonable precautions against performing work on homes that will subject workers or clients to health and safety risks. The home evaluation for energy efficiency includes a health and safety assessment of the dwelling. This assessment includes interviewing the client regarding known health concerns, inspecting the dwelling for present or potential moisture concerns, indoor air quality concerns and other environmental concerns or hazards that may or may not be covered by the WAP. A copy of the Health Assessment Evaluation Form is at the end of this plan. In addition, clients will receive the following publications/documents, when applicable:

Renovate Right (occupants of all buildings built pre-1978)

- EPA Consumers Guide to Radon
- A Brief Guide to Mold, Moisture and your Home
- Asbestos in the Home: A Homeowners Guide
- Health & Safety Notification, Acknowledgement and Assessment Form
- Deferral Form

At the time of application, intake personnel will provide the applicant with a Health & Safety Notification, Acknowledgement and Assessment Form of the applicant and their family unit that must be completed as part of the application process. This form will be inserted in the client file for future reference. The energy auditor will then review the form with the client at the time of the initial assessment. The information collected during this process will be used to aid in determining the best materials and course of action for the weatherization process. When a client's health is fragile and/or the work activities would constitute a health or safety hazard, the occupants at risk will be required to leave the home during these work activities and requested to return at least 1 hour (or a reasonable time as determined by the installers) after installers are scheduled to leave to allow for clean-up/ventilation of the home. Weatherization funds cannot be used to relocate clients or reimburse them for any such costs incurred as a result of the requirement to leave during the work day. Consideration should be given to possible client sensitivities to blown-in insulation or other allergens like dust that the client may be exposed to during the weatherization process.

Weatherization services can be provided in a manner that minimizes risk to workers and clients. Although the Weatherization Assistance Program does not provide all the solutions, awareness of potential hazards is essential to providing quality services. A list of the more common hazards and the preferred approach to them are discussed in Section D, below.

Combustion appliance testing occurs pre- and post-weatherization on every dwelling unit with functional combustion appliances.

Combustion appliance testing will be charged as a program operations expense. Clean, Tune and Evaluate (CTE) is not an allowable health and safety expense unless diagnostics determine the need for further evaluation. Blower Door testing will be charged as a program operations expense.

All evaluations include:

Combustion appliance testing, including:

- CAZ depressurization test
- Carbon monoxide testing, both in-flue and CAZ ambient
- Spillage and draft test
- Gas leak detecting, at least at accessible locations
- Gas oven carbon monoxide testing, gas cook-top inspection for operability flame quality, and cleanliness

Where only sealed combustion appliances are present or only non-combustion appliances exist (electric heat etc.), CAZ depressurization and CAZ draft testing are not required.

For the mold and moisture assessment, the following items provide evidence that a potential for moisture issues exist.

- Water stains or mold in the attic, especially on the roof sheathing (or "drop spots" on the attic floor) and in basements/crawl spaces on framing, insulation and vertical support structures (moisture wicking)
- Mechanical systems and appliances (stains or rusting)
- Standing water in basements or staining indicating periodic flooding
- Exterior grade for negative slope (run-off) toward the dwelling
- Evidence of condensation or mold growth on windows or walls
- Peeling paint in rooms where excess moisture is produced (bathrooms/kitchens)
- Water stains or mold on exterior surfaces
- Basements/crawl spaces with dirt floors
- Unvented dryers, dryers not discharging directly to the exterior
- Bathroom, kitchen or other mechanical ventilation systems not discharging directly to the exterior of the building
- Firewood stored in the basement
- Rack clothes drying anywhere in the house

Other safety assessments:

Costs associated with assessments performed under this category by entities other than a Subgrantee are health and safety expenses. Where Subgrantee sampling requires outside services, those expenses are to be charged to Health and Safety.

- Lead Paint
- Friable asbestos
- Vermiculite
- Unsanitary conditions
- Electrical hazards
- Fire hazards
- Building structure to ensure a safe working environment
- Building ventilation ASHRAE 62.2 2013

When conditions are present that are not feasible due to program funding limitations, auditors will provide the client with a written list of health and safety concerns they found outlined on the Deferral Notice (page 27). The evaluation may describe the corrective action required prior to the dwelling receiving any weatherization and that it is the client's responsibility to correct the conditions if they want weatherization and also a timeframe for how soon the work needs to be done for weatherization to proceed. The Subgrantee is encouraged to provide a list of resources to help address specific safety issue corrections whenever possible. Potential referral resources include but are not limited to:

- Childhood Lead Poisoning Prevention Program
- Lead Hazard Control
- Head Start
- Maternal and Child Health home visiting programs
- Housing and Urban Development
- City or Town welfare
- Rural Economic Development
- Landlords/homeowners
- Any other such sources known by Community Action Programs to be available

Health and safety problems found during the Health & Safety Assessment will result in an agency taking one of the following actions:

1. If the problem(s) must be remedied before or during weatherization, the corrective action is allowable under this guidance, and the cost is reasonable as defined earlier in this document, weatherization can proceed; the health and safety issues must be corrected first.
2. If the problem(s) must be remedied before weatherization measures can be installed, and the corrective action is not allowable under this guidance or the cost is not reasonable, then correction of the health and safety issue becomes the client/owner's responsibility. The agency must defer weatherization, until the issue can be corrected and cannot perform any health and safety repairs until weatherization is able to continue. The agency must also refer the client/owner to any known resource(s) that may be able to help correct the problem.
3. Alternatively, in cases of weatherization deferral due to H&S issues not allowed under DOE guidance such as remediation of asbestos or mold, agencies may consider performing partial weatherization however an energy audit must be used to qualify any other improvement measures that are considered for that home. If partial weatherization is performed, it is also permissible to install allowable health and safety measures. Agencies should use this option with prudence, because once the unit has been weatherized, it may be a long time before that unit is again eligible for weatherization. (measure skipping or partial weatherization was addressed in Subgrantee Memo 14-06 dated December 17, 2013).

Regardless of which option is chosen, the agency must notify the client of all found Health and Safety issues either on the scope of work, or on Deferral Form. It is very important for the agency to document any found health and safety problems and/or any problems or conditions that could potentially result in health and safety problems. Documentation must include photos. Careful and complete documentation can protect the agency from future client claims regarding the results of weatherization.

Potential Hazardous Conditions: Conditions and Allowance

In general, hazardous conditions will be dealt with in accordance with WPN 11-1, 11-6 and 11-6a.

1. **Biologicals:** Remediation of conditions that may lead to or promote biological concerns is allowed as incidental repairs. Please see "Incidental Repairs" section below.

Removal of mold, odors, viruses, bacteria, and unsanitary (including raw sewage or animal excrement) conditions are not allowable weatherization expenses.

2. **Mold and moisture:** In general, mold and moisture issues will be dealt with according to guidance provided in WPN 11-01, 5.15. To summarize, the use of DOE funds for the removal of mold and other related biological substances is not an allowable weatherization expense. Generally, DOE funds should not be used to test, abate, remediate, purchase mold-specific insurance, or alleviate existing mold conditions identified during the audit, the work performance period, or the quality assurance inspection.

**Controlling moisture is crucial to controlling mold. DOE funds may be used to remediate conditions that may lead to or promote biological concerns and unsanitary conditions (installing moisture/vapor barriers over dirt floors, minor repairs to plumbing or sanitary leaks, gutter repairs, splash blocks to direct gutter drains, sump pumps) if these conditions must be remedied to allow effective weatherization work and/or to assure the immediate or future health of workers and clients and cumulative H&S costs are reasonable. Additional details can be found in Section 5.15 of WPN 11-1.

3. **Pests:** Pest removal is allowed only where infestation would prevent weatherization. Infestation of pests may be cause for deferral where it can not be reasonably removed or poses a health and safety concern for workers. Costs to prevent infestation (adding screens over basement windows to prevent future entry) are allowable if costs are reasonable.
4. **Hazards Associated with Combustion Appliances:** Testing of all combustion appliances in every home for carbon monoxide and for gas leaks is required. Testing of carbon monoxide levels occurs in the flue/vent of vented appliances and sealed combustion units and near the exhaust of un-vented appliances; examining draft and draft-ability of flues by performing Combustion Appliance Zone (CAZ) depressurization testing, start-up spillage at flues, and adequacy of combustion air; and testing for gas leaks at all exposed and accessible piping and joints as well as monitoring ambient carbon monoxide in the vicinity of combustion appliances.
 - **Gas Leak Testing:** Testing can occur by auditors using equipment designed for this purpose or by hiring a qualified contractor to perform a pressure test of the piping and joints. If a contractor is used for this purpose, the cost is to be charged to the health and safety budget.

- **Combustion appliances requiring testing:** Furnaces, boilers, space heaters, gas fireplaces, gas stoves and top burners, water heaters and any other such combustion appliances as applicable.
- **PRIMARY** source unvented combustion (natural gas, propane, kerosene, etc) space heaters are required to be removed and properly disposed of prior to weatherization. Removal and disposal costs are health and safety expenses. The replacement of an unvented PRIMARY source space heater with a vented space heater is an allowable health & safety expense and must be charged to Health & Safety unless the replacement can produce an acceptable SIR; then it is to be charged as an energy efficiency measure.
- **SECONDARY** source un-vented combustion space heaters must be removed and properly disposed of unless the appliance complies with ANSI Z21.11.2 (as allowed in WPN 11-6). Removal and disposal costs are H&S expenses. Delivery of weatherization services must be deferred until such appliances are removed or replaced with an ANSI Z21.11.2 rated appliance, at the expense of the owner/client.

Solid Fuel Heating: Maintenance, repair, and replacement of primary source indoor heating units is allowed as a health and safety cost where occupant health and safety is a concern. Replacements that can produce an $SIR \geq 1$ are to be charged as an energy saving measure. Maintenance and repair of secondary source heating units is allowed. Inspections of chimney and flue should be performed. CAZ depressurization diagnostics should be performed. No blower door depressurization should occur while a fire place or wood stove is in operation. If CAZ depressurization diagnostics are performed, auditors must be aware of and alert to the potential for back drafting. Pressurization blower door testing may be performed at the auditor's discretion.

Solid fuel heating sources also create a Combustion Appliance Zone (CAZ). This CAZ must also be tested if it is located away from the other combustion appliances.

In accordance with WPN 11-6, climate justification for heating/cooling system repair and replacement is required for those costs to be allowable health and safety expenses. Northern Nevada has a high number of heating degree days and southern Nevada has a high number of cooling degree days, justifying the necessity to allow for heating and cooling system repairs and replacements. There are approximately 6,800 HDD's in northern Nevada and 3,200 CCD's in southern Nevada.

Allowable actions and costs for combustion appliances as health and safety expenses may include, but not be limited to:

1. Installing a heating or cooling system where none existed can be done in households with at risk occupants. An "at risk" occupant is either an occupant over the age of 60 or under 6 or a person with documented health issues. In cases of documented health issues a doctor's note is required prior to installation and must be retained in the client file.
2. "Red-tagged" or inoperable heating or cooling system*- how this expense is charged depends on availability of current (within 12 months) efficiency information. Inoperable is defined as a unit/system which is not functioning as intended.
 - a) If the system replacement produces an $SIR \geq 1$, it must be charged as an energy saving measure. Efficiency testing results must be available "pre-

- failure". Efficiency information could be by a prior WAP audit or by an HVAC system evaluation performed within the last 12 months. (documentation of efficiency must be maintained in the client file)
- b) If current efficiency testing results are not available, the replacement is to be charged to Health and Safety. Repairs should be favored over replacement whenever possible as a less expensive option. Replacement after repairs have been made is not allowed except on a case-by-case basis with approval by NHD.
 - c) Repairs made to the existing heating system are to be charged to H&S unless the repairs are able to produce an acceptable SIR or are defined general heat waste measures.
3. Hot water heaters that are leaking water, producing high carbon monoxide levels or are drafting poorly: service or repair should be utilized to correct problems where appropriate. If repairs are not appropriate, replacement is allowable and is to be charged as an energy saving measure if replacement produces an $SIR \geq 1$; otherwise it is charged to H&S.
 4. Repair or replacement of solid fuel heating (wood stoves, etc.) as primary heating sources; replacements that provide an $SIR \geq 1$ are charged as energy saving measures.
 5. Vented Primary combustion space heaters are to be treated similar to 1 and 2, above, for heating systems.
 - a) Replacement of an un-vented primary space heater to a vented primary space heater.
 6. Un-vented secondary combustion space heaters: no allowable action; removal required unless ANSI Z21.11.2 rated.
 7. Electric space heaters: no allowable action, removal recommended

If, during diagnostic testing, it is determined that a combustion appliance isn't properly drafting, the cause must be determined and remedied. Costs associated with correcting the drafting issue(s) is an allowable H&S expense if the remedy for the vent/drafting issue is not corrected by an energy saving measure or direct component of the energy saving measure. If the expected cost for repairing the draft/venting issue is determined to be charged to H&S and causes the cumulative H&S costs for the building to become "unreasonable" (as determined by the agency's available per unit H&S average) the job may need to be deferred until those issues are remedied by the owner or other funding source.

Carbon Monoxide Alarms: When a dwelling has any combustion appliances or an attached garage, at least one carbon monoxide (CO) alarm must be present in the dwelling. Manufacturer's installation recommendations will be used to locate the appropriate mounting location when a new alarm is installed; typically this would be where clients spend most of their time, such as near bedrooms. If an entire multi-family building is to receive weatherization services, a CO alarm should be present or installed in each unit of the complex as necessary, unless the complex doesn't have any combustion appliances, including gas stoves. Installing a new alarm when an existing operable alarm is present is not an acceptable H&S expense per WPN 11-6, unless the age of the alarm exceeds the manufacturer's expected useful life.

5. **Fire Hazards:** Combustion appliances and their associated venting systems can present potential fire hazards. Energy auditors must identify inadequate clearances between combustion appliances (including venting systems). Correction of fire hazards is allowable when necessary to perform weatherization.

Additional fire hazards that auditors and crews/contractors need to be aware of are the existence of overloaded electrical circuits when installed improvements will use electricity. See section 9 below.

6. Indoor Air Quality:

1. **Asbestos:** All costs associated with asbestos are to be charged to H&S. Asbestos removal is allowed for pipes, heating systems and other small surfaces, though encapsulation is preferred. All auditors must attend an asbestos awareness training to learn to identify asbestos containing materials and when asbestos containing materials may pose a hazard to clients or workers.

Materials containing or suspected of containing asbestos identified during the evaluation will be brought to the attention of the client/occupant. The condition of the asbestos will be assessed and occupants will be advised not to disturb the material. The client will receive the EPA pamphlet "Asbestos in the Home, a Homeowners Guide". Asbestos testing, encapsulation and removal are allowable H&S expenses under the following conditions:

Covering material on pipes, boilers and other small appliances should be assumed to contain asbestos and, if determined to be in poor/damaged condition, is to be encapsulated by a NV Certified Asbestos Contractor prior to conducting blower door testing. Coverings that are obviously not asbestos (foam, paper covered fiberglass) do not require encapsulation.

- a) Testing for asbestos by a NV Certified Asbestos Consultant at locations where the presence of asbestos is questionable and may be disturbed by weatherization activities is an allowable H&S expense.
- b) The cost for asbestos encapsulation is an allowable H&S expense if the cost is reasonable.
- c) The removal of asbestos on existing pipes for the purpose of replacing a heating system is allowed; removal must be performed by a NV Certified Asbestos Contractor. When asbestos is removed, only the amount necessary to make the final connections plus 3' is allowed. The remainder should be encapsulated if necessary.

Major asbestos problems unrelated to weatherization should be referred to other programs or the Environmental Protection Agency (EPA).

2. **Asbestos siding:** Removal and replacement of asbestos siding is permissible for purposes of installing wall insulation. Cutting and drilling of siding containing asbestos is not allowed. Contractors working with asbestos siding must attend an OSHA-specific training regarding asbestos awareness. It is recommended and preferred to perform interior blows when access allows. All subgrantees should have at least one contractor qualified to work with this type of material to ensure eligible clients receive all the measures for which they are qualified. Any "excess" costs incurred as a result of asbestos health and safety "controls" must be charged to H&S.

3. **Vermiculite:** Vermiculite should be considered to contain asbestos. The EPA does not recognize testing of vermiculite as a reliable method for determining the presence of asbestos. Homes that contain vermiculite are not to receive blower door testing. Personnel should utilize personal air monitoring devices when in attics. Removal of vermiculite is not allowed; however encapsulation by a NV Certified Asbestos Contractor is allowed if costs are reasonable. Auditors will receive training on how to recognize vermiculite insulation. Buildings that have vermiculite in the walls will not have insulation blown into the walls. Blowing insulation on top of vermiculite insulation is not allowed in NV unless the vermiculite has been encapsulated. Auditors will provide clients with the Asbestos in the Home: A Homeowners Guide brochure during the initial evaluation when vermiculite is found. The client file will contain documentation verifying the receipt of this brochure.
4. **Radon:** Testing is an allowable H&S expense. Testing will occur in single units (excluding mobile homes) in areas having high levels of radon (>4pCi//L).

Auditors will provide clients with the EPA Consumers guide to Radon during the initial evaluation. The client file will contain documentation verifying the receipt of this brochure.

All testing must be performed in accordance with EPA protocol for testing to be considered valid. If EPA testing conditions can not be met, testing should not occur.

Auditors should carefully consider the measures to be installed and how they may affect the radon levels in the home. If the auditor determines the condition of a home is not conducive to performing incidental repair work (as defined in Incidental Repairs below) that are likely to also provide benefits for radon reduction, the home should be deferred.

If a home is determined to be suitable for these types of incidental repairs, weatherization can occur with the installation of those repairs included in the package of weatherization improvements, provided the total weatherization package including repairs provides an SIR ≥ 1

Radon abatement is not an allowable activity under the weatherization program. However, the costs for typical weatherization measures that may be helpful in controlling radon levels are allowable weatherization expenditures. Installing a moisture/vapor barrier over dirt spaces aids in reducing radon infiltration into a home as well as in reducing moisture evaporation. Installation of a moisture/vapor barrier is performed as an "incidental repair" and must be cost justified in the improvement package. In accordance with WPN 11-6, all homes with dirt floors in the basement/crawlspace must have a moisture/vapor barrier installed whenever feasible. Moisture barriers must be air sealed as well as possible. In cases where sump pumps are installed for moisture management as an incidental repair, they should be vented to allow radon gas that accumulates in the sump pit to evacuate through the vent.

5. **Formaldehyde, Volatile Organic Compounds (VOCs) and other Air Pollutants:** Formaldehyde vapors may be slowly released by some new carpets, Oriented Strand Board (OSB), plywood, etc. VOCs are also emitted by some household cleaning agents. Removal of pollutants is allowed and is required if

they pose a risk to workers. If pollutants pose a risk to workers and removal isn't possible or allowed by the client, the unit must be deferred.

7. **Lead Paint:** All costs associated with LSW/RRP are to be charged to H&S. Lead is highly toxic, especially to young children. Even low levels of lead in infants, children, and pregnant women are associated with impaired cognitive function, behavior difficulties, fetal organ development and other problems. Low levels of lead in children can cause reduced intelligence and impaired hearing.

The most common source of lead exposure for children is lead paint in older homes and the contaminated dust and soil it generates. For this reason, it is very important weatherization work is completed in a lead-safe way.

Local agencies are encouraged to obtain Pollution Occurrence Insurance (POI).

1) Training and Compliance

This section does not cover all the requirements for either RRP or LSW but rather provides some highlights of specific requirements.

a) Training for LRRP requirements is readily available in or near NV by qualified instructors. All Subgrantee field staff and their contractors are required to receive LSW and LRRP training. All contractors working in homes with lead based paint are additionally required to be Certified Firms and have a designated Certified Renovator responsible for the job as required by the LRRP rule. All subgrantees are to maintain copies of staff, crew and contractor certificates on file.

b) Subgrantees are reminded that LSW de minimis requirements are more stringent than RRP and must be followed. Containment is ALWAYS REQUIRED when lead based painted surfaces are disturbed.

c) NHD has created and provided all agencies with a client acknowledgement form that the client signs acknowledging receipt of the the EPA publication "Renovate Right, Important Lead Hazard Information for families, child care providers and schools. This client acknowledgement form is required to be in all client files when the home is dated pre-1978.

Lead abatement under the weatherization assistance program is not an allowable expense. Agencies must defer weatherization on homes that require lead paint abatement.

LSW must be applied to all pre-1978 housing unless EPA approved testing methods determine no lead is present.

One of the following methods must be used to determine the paint to be disturbed is not lead-based paint:

Written determination by a NV Licensed lead inspector or risk assessor;
OR - Proper use of EPA-recognized test kits.(documenting manufacturer and model of test kit used, description and location of components tested, and test kit results) Note: beginning in 2010, tests must be performed by a

Certified Renovator, per EPA final rule. OR - A State-approved lead-based paint test protocol (e.g., XRF scans verifying absence of lead paint).

Mobile Homes. Often, interiors of mobile homes were not painted but rather, paneling was applied to the surfaces. Therefore, pre-1978 mobile homes that were not painted by the manufacturer, occupant, landlord, or past owner of the unit before 1978, may be exempt from LSW. However, Weatherization Programs must verify the areas receiving weatherization services have never been painted or were painted for the first time after 1978. If this is not verifiable, then LSW protocols must be followed. Painted exterior surfaces on pre-1978 units should not be drilled, scraped, sanded, or receive any other work that disturbs the paint.

Containment: Containment is required in all cases when LSW must be performed. The level of containment is determined by the surface area being disturbed.

Containment is anything that stops dust and debris from spreading beyond the work area. The level of containment must be determined by the auditor or supervisor before work is assigned to a crew or contractor.

Level 1 Containment is required in pre-1978 homes when LESS than 6 sq. ft. of interior painted surface per room or LESS than 20 sq. ft. of exterior painted surface will be disturbed. Level 1 containment consists of methods and means for preventing dust generation and contains debris generated during the work process. The specific containment used should be of appropriate type and size for the work being performed. Measures that may fall within this guideline include but are not limited to:

- Installing or replacing a thermostat
- Drilling and patching test holes
- Replacing HEPA filters and cleaning HEPA vacuums
- Changing furnace filter
- Removing caulk or window putty (interior or exterior)
- Removing weather-stripping

Level 2 Containment is required when weatherization activities will disturb MORE than 6 sq. ft. of interior surface per room or MORE than 20 sq. ft. of exterior surfaces. Level 2 containment consists of methods that define a work area that will not allow any dust or debris from the work area to spread. Level 2 containment requires the covering of all horizontal surfaces, constructing barrier walls, sealing doorways, covering HVAC registers with approved materials, and closing windows to prevent the spread of dust and debris. Measures requiring level 2 containment MAY include:

- Drilling holes in interior walls for installing insulation
- Drilling holes and/or removing siding on exterior walls
- Cutting attic access into ceiling or knee walls
- Planning a door in place
- Replacing door jambs and thresholds
- Replacing windows or doors
- Furnace replacements

**Disturbed Surface Area- When removing painted components or portions of painted components, the entire surface area removed is the amount of painted surface disturbed.

Additionally, Level 2 containment must ALWAYS be used when any of the following is conducted (even if the activities will disturb less than the hazard de minimis levels within the Level 1 category)

- Window replacement
- Demolition of painted surfaces
- Open-flame burning or torching;
- Machines to remove paint through high-speed operation without HEPA exhaust control;
- Operating a heat gun at temperatures at or above 1100 degrees Fahrenheit.

Proper LSW clean-up and disposal debris is required to adequately clean up the job site. HEPA vacuum must be used to clean up the work areas and further cleaning may be necessary, based on the hazard. Disposal of debris must meet federal, state and local regulations.

All client files of pre-1978 homes receiving weatherization are required to have documentation indicating whether LSW is or is not required. NV NHD has created and distributed a Lead and Mold Check List sheet that all Subgrantee crews and contractors are required to complete and maintain in the client file for pre-1978 buildings as supporting evidence for complying with the LRRP rules. Pictures for containment are also required to be maintained in the client files. NHD will monitor compliance with LSW through regularly scheduled monitoring visits, in-process inspections whenever feasible, and during programmatic reviews when reviewing client files. Instances of non-compliance will be handled individually as they arise through the normal course of required corrective actions specified in the monitoring report.

If a local agency crew or contractor is found to be non-compliant with the LSW policies, procedures and minimum standards, NHD will notify the local agency in writing of the non-compliance. The local agency will be required to submit a written corrective action plan to the state. Monitoring for compliance with the corrective action plan and LSW policies is likely to occur.

DOE requires grantees to follow the specified EPA requirements; therefore all agencies and their contractors must also follow these requirements. Subgrantees must also follow the specified EPA and Occupational Safety and Health Administration (OSHA) standards for Worker Safety as well as any state or local requirements.

Client notification requirements: For occupied homes, the Weatherization staff, crew, or contractor must have an adult tenant or homeowner sign an acknowledgement after receiving the EPA "Renovate Right" pamphlet. The "Renovate Right" pamphlet can also be sent by certified mail with receipt to be placed in the customer file.

In multi-unit housing, the agency must provide written notice to each affected unit (notice must describe general nature and locations of the planned renovation activities; the expected starting and ending dates; statement of how occupant can get "Renovate Right" pamphlet at no charge); or

Post informational signs (signs must describe general nature and locations of the renovation and the anticipated completion date) and post the EPA "Renovate Right" pamphlet. (If "Renovate Right" pamphlet is not posted then agencies are required to provide information on how interested occupants can review a copy of the "Renovate Right" pamphlet or obtain a copy at no cost from the Weatherization Program).

If unable to hand-deliver, acknowledgement can be sent by certified mail, return-receipt requested. A copy of the receipt then goes into the client's file. The owner/occupant must acknowledge receipt of the EPA "Renovate Right" pamphlet indicating the address of the unit undergoing renovation, name and signature of owner or occupant, and the date of signature prior to the start of renovations. It must be in the same language as "contract for renovation" for an owner occupied (or the same language as the lease for occupant of non-owner occupied) target housing.

If the Weatherization Program cannot obtain a signed acknowledgment (either the occupant is not home or refuses to sign the form), then a self-certification form must be signed to prove delivery. This can be found at the back of the Renovate Right brochure.

The acknowledgement form must be filed and remain with the client. In addition to providing a copy of the "Renovate Right" pamphlet to owners and occupants, designated local agency staff (e.g., intake specialist, Auditor/Inspector, crew chief) must discuss the hazards associated with lead-based paint and lead dust, and describe how they will conduct LSW in the home.

NHD has created and distributed a Lead and Mold Check List that all subgrantee crews and contractors are required to complete and maintain in the client file as documentation that LSW and LRRP rules have been followed.

The following information is required with the Lead and Mold Check List or as separate information in the client file:

1. Client sign-off indicating they received the Renovate Right Brochure (Consent and Agreement form)
2. Name of Certified Renovator responsible for the job (insert at top of LSW guide sheet)
3. Lead paint test results or lead-free report produced from a NV Licensed Lead Paint Inspector or assessor (Certified Renovator Lead test results or lead report must be attached to LSW guide sheet)
4. Photos of the site
5. Photos of the containment areas
6. Cleaning verification results

WPN 09-6 augments but does not replace WPN 08-6 which builds on the foundation provided by WPN 02-6, and in particular, all weatherization staff is required to continue to perform LSW accordingly.

In accordance with WPN 11-6, testing for lead based paint is an allowable health and safety expense. Job site set up and cleaning verification is required by a Certified Renovator.

Subgrantees must ask if a resident of a pre-1978 home has been identified as being lead poisoned while living in the home. If the answer is yes, proceed with the inspection but coordinate with the local health department before disturbing any paint. If a child has lead poisoning, deferral is required until the child has been treated and is no longer determined to be lead poisoned. Deferral is required when the extent and condition of lead based paint in the house would potentially create further health and safety hazards.

8. **Structural:** Subgrantees are reminded the WAP program is not a home rehabilitation or general repair program. Repairs are limited to "incidental" repairs where indicated in the NV WAP Standards. 10 CFR Section 440.3 defines these as follows: Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program. Examples of these limited repairs include sealing minor roof leaks to preserve new attic insulation and repairing water-damaged flooring as part of replacing a water heater.

While repair to a roof to protect the insulation to be installed is allowable, expanding this definition to include roof replacement or for other non-energy related repairs is not a permissible use of DOE funds. If the roof needs replacing the unit should either be referred to a rehabilitation program or the Subgrantee must use other funds to cover the costs for this type of work.

Roofing repairs are to be charged as incidental repairs and must be included and cost justified in the improvement package of the project.

Workers must take all reasonable precautions against performing work on homes that will subject workers or occupants to health and safety risks. Minor repairs and installation may be conducted only when necessary to effectively weatherize the home; otherwise these measures are not allowed.

Dwellings whose structural integrity is in question should be deferred and referred to other programs. Buildings that have been determined to have structural problems that are beyond the scope of weatherization services may need to be deferred until the dwelling can be made safe for crews and occupants.

Incidental repairs are those repairs that are necessary for the effective performance or preservation of energy saving measures/materials. All estimated incidental repair costs, including labor and materials must be included on the SIR report generated for the project work order. Cumulative repair costs must not cause the overall job to fall below an SIR of 1.

Incidental Repairs: The following health and safety repairs should be charged as "incidental repairs" and are to be included in the total SIR of the project; they are not to be charged to Health and Safety.

- **Biologicals, odors, mustiness, bacteria, viruses, raw sewage, rotting wood etc.**
Repair of biological-creating conditions as indicated but not limited to below:
 1. Repair of plumbing and sewer leaks inside the home or plumbing leaks outside the home such as hose bibs (garden hose faucets) that may be leaking and draining against the foundation
 2. Repair of water damaged materials that must be repaired to allow for installation of energy saving materials. Repair of water damaged material that will dry after the offending repair is complete and isn't required to perform weatherization is NOT allowed.

- **Building structure and Roofing**
 1. Minor Roofing repairs (limited to \$350)
 2. Minor Structural repairs that are necessary to allow for effective weatherization (limited to \$350)
 3. Water damaged window or door trim or framing that needs to be replaced to prevent moisture infiltration into the building (limited to \$350)
 4. Other such moisture control measures necessary to prevent moisture infiltration into the building structure

- **Drainage gutters, down spouts, extensions, flashing, sump pumps, landscape, etc.**
 1. Installation or repair of gutters, downspouts, downspout splash blocks or extensions when basements/crawl spaces have evidence of moisture infiltration
 2. Installation of flashings to direct water away from the building and or foundation where evidence of moisture damage due to long term water exposure is evident
 3. Installation of sump pumps and associated plumbing and electrical to prevent bulk moisture build-up in basements/crawl spaces
 4. Minor Drainage or landscape modifications necessary to divert roof or natural water run-off from infiltrating into the foundation that does not require motorized earth moving equipment
 5. Other repairs (minor) necessary to control moisture infiltration into the building

- **Electrical-Other than knob and tube**
 1. Where the installation of an electrical weatherization measure requires the repair of an existing hazardous or undersized circuit or necessary installation of a new circuit and the combined cost causes the energy efficient measure to drop below an SIR of 1.

- **Mold and Moisture:** A major indoor air quality problem is excess moisture or humidity in a home. Too much moisture may result in moisture penetration, condensation, and build-up in walls and ceilings. Moisture accumulation may also cause wood rot. Too much indoor moisture or humidity can also lead to the growth of mold and mildew which can cause adverse health effects for the occupants.

Energy auditors use the following to identify potential moisture problems when assessing a client's home:

- Damp atmosphere or a musty smell in the dwelling, basement, or crawlspace
- Client complaints of allergy-like symptoms
- Mold growth on walls and ceilings, especially in bathrooms and kitchens
- Mold growth on attic roof sheathing
- Signs of condensation on walls or windows
- Water damage or mold on the underside of roof decking
- Evidence of crawlspace moisture
- Water stains on foundation walls

When a moisture problem is identified, energy auditors determine the source of the problem and outline solutions or generate specific work order measures to mitigate the problem. Energy auditors inform clients of any mold that is found and of its location. Auditors explain to clients that the auditor is not a mold expert and that the mold assessment was a visual assessment only and that no testing for mold was completed.

1. Repairing conditions that cause or create mold or moist conditions in a home as indicated above in Biologicals and Drainage.
- **Radon:** Radon assessments are not part of weatherization in Nevada, however, there are a few counties where Radon is possible. In those counties vapor barriers are installed in dwellings with accessible crawlspaces where there is exposed soil. Radon education is included in client education.
 - **Spray Polyurethane Foam:** Polyurethane Foam is used for roof coating of mobile homes only and is an approved DOE measure on Nevada's Southern Priority List. When two-part foam insulation is used clients are made aware of possible off-gassing during the short curing period, and the associated risks to chemically sensitive people. If the client is unable to leave the home and the intended work may exacerbate an occupant's health condition, the home may need to be deferred.

- **Window and Door Replacement, Window Guards**
 1. Replacement of skylights that leak water and have visible evidence of moisture damage (beyond water staining) and deterioration of the window assembly or building material around the window cannot be repaired under this section but may be allowed as an incidental repair or an efficiency measure if it is cost justified.
 2. Repair of trim and/or flashings around windows or doors to prevent water infiltration may be allowed as an incidental repair.
 3. Repair or replacement of window sashes that allow water infiltration into a building structure may be allowed as an incidental repair.
 4. Repair or replacement of a door panel that allows water infiltration into a building structure may be allowed as an incidental repair

9. **Ventilation:** Ventilation requirements as outlined in WNP 11-6 are required. The NV WAP has adopted ASHRAE 62.2 2013 for existing buildings. All Subgrantee field staff and contractors assessing dwellings for ASHRAE compliance have been trained through NHD.

NHD has discussed with DOE how costs of ASHRAE compliance are driving up the Health and Safety costs of this program.

10. **Electrical Issues:** The two primary energy-related health and safety electrical concerns are insulating homes that contain knob-and-tube wiring and identifying overloaded electrical circuits. Older electric wiring, primarily knob-and-tube wiring, located in a wall cavity or exposed on an attic floor was intended by code to have free air movement that would cool the wire when it is carrying an electric current. Laboratory tests have shown that retrofitting thermal insulation around damaged knob & tube (K&T) electric wiring can cause it to overheat, resulting in a fire hazard. When K & T wiring is present in a home, it should be determined if the walls and attic have active K & T present. Walls that have live K & T present are not to be insulated by the weatherization program. Attics that have live K & T present can have insulation installed up to just below the wire but must be dammed to the sides and above to providing a minimum of 2" clear space between the wire and the dam. The K & T "run" should be "marked" using surveyor's type tape or other marking device such as lawn flags. Open junction boxes located in the attic where insulation will be installed must be appropriately covered with metal covers and should also be marked with tape or other signage indicating their location for future service. K & T inspections and voltage drop detection are allowable health and safety expenses if they are necessary and the costs are reasonable. All electrical work and testing must be performed by a licensed NV electrician.

Repairs to K&T wiring are not a direct component to insulating and should not be included in the cost of any energy saving measure.

Serious electrical hazards exist when gross overloads are present. Should auditors and crews find such existing problems, they should notify the owner. Weatherization measures that involve the installation of new equipment such as air conditioners, heat pumps, or electric water heaters can exacerbate previously marginal overload problems to hazardous levels. The problem should also be noted in the client file. Installing or repairing circuits to allow for new appliances or "systems" recommended as weatherization measures or other minor electrical repairs necessary for the effective installation of or because of the installation of electronic weatherization measures are allowable and should be included with the cost of the weatherization measure and should not be charged to health and safety. The client/owner must be

notified if any unsafe conditions are found during the assessment or by crew/contractors that cannot be addressed through weatherization.

11. Refrigerant Issues: WPN 00-05 and WPN 11-06 require that as part of any refrigerator replacement program, agencies reclaim refrigerant per the Clean Air Act of 1990, section 608, as amended by 40 CFR 82, 5/14/93. The appliance vendor, de-manufacturing center, or other entity recovering the refrigerant must possess EPA-approved section 608 type I or universal certification. Subgrantees should ensure they have appropriate protocols in place that comply with all standards relating to the disposal of the existing appliances.

12. Code Compliance Issues: All field personnel (including auditors) are strongly encouraged to attend "building/construction code" instructional classes. The intent of the training is not to learn all codes for all trades, but to be aware of codes in the areas that weatherization auditors and crews/contractors commonly encounter.

Correcting existing code violations in a dwelling is not allowed unless the code corrective action is required because of the installation of a weatherization measure. State and local (or authority having jurisdiction) codes must be followed when installing weatherization measures. Condemned properties and properties where "red tagged" health and safety conditions can not be corrected under these health and safety standards should be deferred. Code corrections that are required because of weatherization but are not a direct component of a weatherization measure are to be charged as H&S expenses.

It is the Subgrantees' responsibility to ensure that all weatherization-related work conform with applicable codes in jurisdictions where the work is being performed.

13. Health and Safety call-backs: Call-back work is work that is performed on a unit after it has been reported to DOE as complete. Call-backs for health and safety reasons are not allowed except where serious safety concerns for the occupants of the home exist, for example, in a situation where a potential for carbon monoxide poisoning exists. These instances will be judged on a case-by-case basis, and approved by NHD. When a call-back is necessary, agencies must submit and receive approval for a waiver prior to performing the work. Call-back work performed prior to receiving an approved waiver may not be reimbursed.

14. Deferral Standards: Deferral may be necessary if Health and Safety issues cannot be adequately addressed. The decision to defer work in a dwelling is difficult, but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. In the judgment of the auditor, any existing conditions that may endanger the health and/or safety of the workers or occupants may cause weatherization to be deferred. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Subgrantee staff and contractors, are expected to pursue reasonable options, including referrals and to use good judgment in dealing with difficult situations.

Subgrantees use NV WAP's Deferral Form for such situations. The form must be filled out completely and contain a clear description of the problem, conditions under which weatherization could continue, the responsibilities of all parties involved, and the client's signature indicating that they understand and have been informed of their rights and options. A copy of Nevada's Deferral Form is contained at the end of this plan.

Deferral conditions may include:

1. The client has known health conditions that prohibit the installation of insulation and other weatherization materials.
2. The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that the conditions cannot be resolved within these guidelines and at reasonable costs, i.e. repairs are beyond incidental.
3. The house has sewage or other sanitary problems including pet/animal excrement that can't be corrected through weatherization and would further endanger the client and weatherization installers if weatherization work were performed.
4. The house has been condemned or electrical, plumbing, or other equipment has been "red tagged" by local or state building officials or utility companies and weatherization funds are not sufficient or corrective measures are not allowable costs.
5. Moisture or potential moisture problems, as discussed in D-1 above, that cannot be resolved under existing health and safety guidelines and with minor repairs.
6. Dangerous conditions in the home due to high carbon monoxide levels in combustion appliances or their venting which cannot be resolved under existing health and safety guidance. Subgrantees should take immediate action to ensure the appliance is not used, including instructing the client to contact a combustion appliance repair/replacement specialist.
7. The client is uncooperative, abusive, or threatening to WAP Staff or contractors..
8. The extent and condition of lead-based paint or any other identified hazardous condition in the house that could potentially create further health and safety hazards.
9. Pest infestation that can not be reasonably removed or poses health concerns for workers.
10. In the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the work crew or subcontractor
11. Homes with conditions that have the potential to create a health concern requiring more than incidental repair should be deferred.

Health Assessment Evaluation Form
Weatherization Assistance Program

CLIENT INFORMATION

Client Name: _____

Phone: _____

Address: _____

City: _____

An interview with the client indicates they or a household member is currently experiencing the following health problems?

NONE Asthma Allergies Respiratory problems Lead Poisoning

Other Describe: _____

DISALLOWED WEATHERIZATION MEASURES/ACTIVITIES

As a result of the health problems identified above, the following weatherization related measures/activities may exasperate existing occupant health concerns and therefore, may not be performed:

- | | |
|--|--|
| <input type="checkbox"/> Lead based paint activities | <input type="checkbox"/> Blower door or duct blaster testing |
| <input type="checkbox"/> Installation of blown-in insulation | <input type="checkbox"/> Two-part foam insulation |
| <input type="checkbox"/> Other (Describe): _____ | |

CERTIFICATION

I certify I have read the contents of this form and request the measures disallowed above:

- Not be installed.
- Be installed and agree not to be in the house while the measure(s) is being installed and agree to remove at my own expense, any measures which may later prove to be problematic.

Client signature: _____

Date: _____

- I have explained to the client, the impact performing the weatherization measures or activities described above could have regarding the health problem(s) identified above.

Name of Subgrantee Agency or Contractor:

Name of Auditor:

Date: _____

**Health Assessment Evaluation Form
(Instructions)
Weatherization Assistance Program**

The purpose of this form is to identify any client related health problems which could be made worse by installing measures or conducting tests related to any weatherization activities.

Agencies are to complete this form during the course of the initial interview with the client (typically over the phone). Agencies are to question the client whether they or any household members have asthma, allergies, lead poisoning or respiratory problems. If the answer is yes, please check the appropriate box under client information.

The agencies or their designated agent(s) are to provide a copy of the form to the auditor/assessor conducting the initial energy audit. The auditor is to determine if an existing health problem would be worsened by installing any of the WAP measures or conducting any of the WAP test procedures. If the work could result in making an existing condition worse, the measure or activity will be disallowed. The auditor is to discuss any measure or activity being disallowed with the client and state the measure/activity being disallowed on the form.

The auditor is to obtain the clients signature and print their name at the bottom of the form.

Agencies are to retain a copy of the form in the file of each client receiving weatherization assistance with DOE funds.

WEATHERIZATION DEFERRAL NOTICE

Client: _____ Phone: _____

Address: _____ City: _____

The following problems prevent the installation of Weatherization conservation measure(s) at this time:

Problems with combustion appliances we are unable to correct:

Furnace/Heater Water Heater Range/Oven Clothes Dryer

Other: _____

Extensive repair of structure or mechanical systems is required that is cost-prohibitive:

Structure Plumbing Electrical Heating

Other: _____

Sanitation problems are present which could endanger the weatherization crew:

Sewage

Other: _____

Severe moisture problems are present:

Structure Crawl Space Attic

Other: _____

Harmful pesticide residue / Hazardous pest/insect infestation is present in:

Dwelling Yard Crawl Space Attic

Other: _____

Excessive peeling paint on pre-1979 home:

Interior Work Area Exterior Work Area

Other: _____

Other problems:

If these problems can be satisfactorily corrected within 30 days from the date of this notification, then we will resume work on this property. If the problems are not corrected within this time period, we will assume that you are unable to make the necessary corrections and your file will be closed.

Please contact our office at the number below to determine if we can assist in referring you to other programs or agencies or to report that all problems have been corrected.

Agency: _____ Phone: _____

I/we have read (or had explained) the contents of this form.

Occupant: _____ Date: _____

Weatherization Agent: _____ Date: _____